ECRA-002 12/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT INDUSTRIAL SITE EVALUATION ELEMENT CN 028, TRENTON, N.J. 08625

ENVIRONMENTAL CLEANUP RESPONSIBILITY ACT (ECRA)

INITIAL NOTICE

SITE EVALUATION SUBMISSION (SES)

This is the second part of a two-part application form. This information must be submitted within 45 days following any applicable situation as specified at N.J.A.C. 7:26B-1.5 or any triggering event as specified at N.J.A.C. 7:26B-1.6. Please refer to the instructions and N.J.A.C. 7:26B-3.2 before filling out this form. Answer all questions. Should you encounter any problems in completing this form, we recommend that you discuss the matter with a representative from the Element. Submitting incorrect or insufficient data may cause processing delays and possible postponement of your transaction. Please call (609) 633-7141 between the hours of 8:30 a.m. and 4:30 p.m. to request assistance.

Industrial Establishment Name Arsynco Inc. Address 13th Street City or Town Carlstadt Zip Code 07072 Municipality Carlstadt County Bergen A. Operational and Ownership History: (Attach additional sheets if necessary) Owneri	er minere.				
Name Arsynco Inc. Address 13th Street City or Town Carlstadt Zip Code 07072 Municipality Carlstadt County Bergen A. Operational and Ownership History: (Attach additional sheets if necessary) Name Operator From To Current Address	ASE PRINT OR TYPE		• · · · · · · • · · · · · · · · · · · ·	Date Ma	arch 23, 1993
Address 13th Street City or Town Carlstadt Zip Code 07072 Municipality Carlstadt County Bergen A. Operational and Ownership History: (Attach additional sheets if necessary) Name Operator From To Current Address	ndustrial Establishment				
City or Town Carlstadt Zip Code 07072 Municipality Carlstadt County Bergen A. Operational and Ownership History: (Attach additional sheets if necessary) Owner: Owner: Operator From To Current Address	Name Arsynco Inc.				
Municipality Carlstadt County Bergen A. Operational and Ownership History: (Attach additional sheets if necessary) Owner/ Name Operator From To Current Address	Address 13th Street				·
A. Operational and Ownership History: (Attach additional sheets if necessary) Owner: Name Operator From To Current Address	City or Town Carlstadt		- <u> 1</u>	Zip	Code <u>07072</u>
A. Operational and Ownership History: (Attach additional sheets if necessary) Owner: Name Operator From To Current Address	Municipality <u>Carlstadt</u>		Co	unty <u>Berge</u>	n
Owner/ Name Operator From To Current Address	A Operational and Ownership His	sorv: (Attach addina	nal sheets if no	cessarvi	
Name Operator From To Current Address	- Operativity and Ownership (113		rest orested if the	Činisiu	
Please refer to Attachment A.	Name		From	To	Current Address
	Please refer to Att	achment A.			
	- 				
	<u> </u>			•	
		<u> </u>			
	Please refer to Ati	tachment B.	,	,	•
Please refer to Attachment B.					
Please refer to Attachment B.					
			•	SDN Hilling	S Document

	here if no p	ermits are inv	olved			• •	
.a				arroi			
	:W lazey Di	ureau of Air P			se refer to At	ctachment C.	
	Permit Number	Certificate Number		or Denial		or Denial plicable)	Expiration Date
						····	·
					· ·		
_						<u> </u>	
			•			· · · · · · · · · · · · · · · · · · ·	×
			<u>,</u>		···		• •
	•						
D N	Iaman D	allume Dissi	oiga Elimi	nation System (NIDDES)	•	
T	em jerzeň L	Ondisan Disca	arge Emin	impoli 3 ysterri (MFDE3)		
٠	Number	Discha Activ Non-cont	ity	Date Issued or Denied	Expiration Date	Body of V Discharged	
NJOC	30970 *	. Cooling	water _	??	7/1/93	Berry's Cre	ek
 .	04.050	Infiltra Percolat	-	•	40/04/04		
	.01958			?	12/31/94 A) Identification N	Groundwater	·
C. U g n ii D. R	Inited State enerator And NJDO as a copy of the Resource, Co	Environment nual Report pro 044688935 the Annual Re onservation, R	al Protection pursuant pursuant attach	ed? XX Y	A) Identification N Jersey Hazardous V es (See Attachment nit # <u>NON</u>	fumber and copy of Waste Regulations. #	f the most rece
C. U S D. R E. E	Inited State enerator And D # NJD(s a copy of the desource, Co dureau of United	Environment nual Report pro 044688935 the Annual Re onservation, R	port attach	ed? XX Y	A) Identification No Jersey Hazardous V	fumber and copy of Waste Regulations. #	f the most rece (If applicable)
C. U S II D. R E. E	Inited State enerator And D # NJD(s a copy of the desource, Co dureau of United	Environment nual Report pro 044688935 the Annual Re onservation, R	epared purs port attach ecovery A orage Tank ai governm	ed? XX Y ct (RCRA) Perr Registration Numerical permits.	A) Identification N Jersey Hazardous V es (See Attachment nit # <u>NON</u>	fumber and copy of Waste Regulations. #	f the most rece (If applicable)
D. R. F. F.	Inited State enerator And NJDO as a copy of the Resource, Consultation of United All other feet	Environment nual Report pri 044688935 the Annual Re- conservation, Re- inderground Strate, loc- eral, state, loc-	port attach ecovery Adorage Tank ai governmening Permi	ed? XX Y ct (RCRA) Perr Registration Numerical permits.	A) Identification No Jersey Hazardous Ves (See Attachment mit # NON 1004248	fumber and copy of Waste Regulations. #_D	f the most rece (If applicable)No
D. R. F.	Inited State enerator And D # NJD() s a copy of the Resource, Con Bureau of Un All other fed Bergen C	Environment nual Report pri 044688935 the Annual Re- onservation, Re- inderground Sta- eral, state, loc Agency Issu	ai Protection epared purs eport attach ecovery Actoring Tank ai governmenting Permi	ed? XX Y ct (RCRA) Perr Registration Numerical permits.	A) Identification No Jersey Hazardous Ves (See Attachment NON mit # NON 1024248	Jumber and copy of Waste Regulations. # D	f the most rece (If applicable) No Expiration Date

officially transfered to BCUA permit only as of 2/1/93.

ECRA-002 12/87

Che	eck here if no enforcement actions are involved Please refer to Attachme	ent E.
A.	Date of Action	
	Section of Law or Statute violated	
	Type of Enforcement Action	
	Description of the Violation	
		· · · ·
		
	· · · · · · · · · · · · · · · · · · ·	
	How was the violation resolved?	
В.	Date of Action	
•	Section of Law or Statute violated	
	Type of Enforcement Action	
	Description of the Violation	
	How was the violation resolved?	
c:	ite Map	
	this map enclosed? xx Yes (See Attachment # F No	
If	No. state the reason	

Decr	ription of Operation	,/li3-	•	·
Is thi	is report enclosed	i? <u>vy</u> Yes	(See Attachment # G	No
If No	o, state the reason	l		
Desc	cription of Buildi	ng Heating System	m:	•
A. E	How is the Indust	rial Establishmen	t currently heated? (Oil, Gas, Electri	Combination of c) gas and oil heat
F	How long has the	Industrial Establi	ishment been heated by the above fue	/energy source: gas = 11 years oil = at least 24
B. V	Was the Industria	l Establishment h	neated by fuel oil at any time: X	X YesNo
L	ls information on	the decommission	ning of underground fuel oil tanks in	cluded with item No. 14 of this form?
-	YesX	X No If no, ex	xplain below:	•
	All fuel o	oil tanks are	e located above ground.	See SPS item 9
_			e rocatea above ground.	
ئم ،C -	Yes (See A	trachment #	luation for Existing Underground Fue XX No If no, state the	
- - 7. S	Yes (See A it	trachment # tem 6. B., ab		reason See response to
7. 5	Yes (See A	trachment # tem 6. B., ab		reason See response to
7. S	Yes (See A it Summary of Indu	trachment # tem 6. B., ab		y and/or Industrial Waste:
7. S	Yes (See A it Summary of Indu A. Discharge From	tem 6. B., ab strial Establishme Period To		y and/or Industrial Waste: Treatment By
7. \$	Yes (See A it Summary of Indu A. Discharge From 1988 ? B. If the Industry plant, provide	em 6. B., ab strial Establishme Period To Present 1988 rial Establishment e the name/addres	Discharge Type Industrial wastewater/ sanitary Industrial wastewater/ sanitary Industrial wastewater/ sanitary it discharges sanitary and/or industrials of that facility.	y and/or Industrial Waste: Treatment By Bergen Ctv. Util. Authority Joint Mtg. Carlstadt Sewer C
7. \$	Yes (See A it Summary of Indu A. Discharge From 1988 ? B. If the Industry plant, provid Name Berg	Period To Present 1988 rai Establishment e the name/addres gen County Ut	Discharge Type Industrial wastewater/ sanitary Industrial wastewater/ sanitary Industrial wastewater/ sanitary Industrial wastewater/ sanitary It discharges sanitary and/or industrials of that facility. tilities Authority Tel	y and/or Industrial Waste: Treatment By Bergen Cty. Util. Authority Joint Mtg. Carlstadt Sewer (
7. \$	Yes (See A it Summary of Indu A. Discharge From 1988 ? B. If the Industr plant, provid Name Berg Street Addre	Period To Present 1988 rial Establishment e the name/address gen County Ut	Discharge Type Industrial wastewater/ sanitary Industrial wastewater/ sanitary Industrial wastewater/ sanitary It discharges sanitary and/or industrials of that facility. tilities Authority Tel Foot of Mehrhof Road	y and/or Industrial Waste: Treatment By Bergen Ctv. Util. Authority Joint Mtg. Carlstadt Sewer (i wastes to a publicly-owned treatment ephone # (201) 641-2552
7. \$	Yes (See A it Summary of Indu A. Discharge From 1988 ? B. If the Industr plant, provid Name Berg Street Addre	Period To Present 1988 rial Establishment e the name/address gen County Ut	Discharge Type Industrial wastewater/ sanitary Industrial wastewater/ sanitary Industrial wastewater/ sanitary Industrial wastewater/ sanitary It discharges sanitary and/or industrials of that facility. tilities Authority Tel Foot of Mehrhof Road	y and/or Industrial Waste: Treatment By Bergen Ctv. Util. Authority Joint Mtg. Carlstadt Sewer (i wastes to a publicly-owned treatment epinone # (201) 641-2552
7. \$	Yes (See A it Summary of Indu A. Discharge From 1988 ? B. If the Industr plant, provid Name Berg Street Addre Municipality Date:	Period To Present 1988 rial Establishment e the name/address gen County Ut	Discharge Type Industrial wastewater/ sanitary Industrial wastewater/ sanitary Industrial wastewater/ sanitary Industrial wastewater/ sanitary It discharges sanitary and/or industrials of that facility. tilities Authority Tel Foot of Mehrhof Road	y and/or Industrial Waste: Treatment By Bergen Ctv. Util. Authority Joint Mtg. Carlstadt Sewer Communications and publicly-owned treatment ephone # (201) 641-2552

Hazardous Substance and Type of Storage Unit	Date Installed	Area or Volumetric Capacity (include units)	Material Stored	Construction Type	Location Reference	Decommission in or Sampling Reference
					-	
					•	
Hazardous Substance/Wast	:Inventory: Plea	se refer to Attachme	ent I.			
Hazardous Substance/Wast Material Name	e inventory: Plea Quantity (indicate units)			Storage Method ontainer Type/Size	Typical Annual lisage	on Site
Material	Quantity (indicate				Annual	on Site
Material	Quantity (indicate		erence C		Annual	on Site
	Quantity (indicate		erence C		Annual	To Remain on Site (Yes or No)

Have there been any discharges of haza XX Yes (Complete Item B below)	ardous substances andNo (Go to Ita	wastes? em 10C) Please refe	er to Attachn
Summary of Discharges and Resolution	ns Please r	efer to Attachmer	t J.
Description of Discharge	Event	Response and Res	<u>olutions</u>
† (
		•	· .
•			·
			· · · · · · · · · · · · · · · · · · ·
			-
			<u>.</u>
			<u> </u>
Is this Industrial Establishment subjeted Part 112 or Discharge Prevention, requirements?	Containment and Co		per NJAC 7:1E-4.1
impling Plan Proposal	\		·
. Is sampling proposed at the facility?	_xx_Yes (See A)	ttachment #) No_	
		•	
If sampling is not proposed, please ex		•	•
Sampling and Analysis Pl	an is currentl	y under preparation a	and will
be submitted shortly und	er separate co	ver.	•
		,	
			,
·		·	
. Is groundwater sampling proposed? Please refer to Attachm		•	or Hydrogeolog Form 002A "Reques

CRA-002	
.2/87	
2. Decontamination/Decommissioning Plan	
A. Is the facility Decontamination/Decommissioning Plan enclosed?	
XX_Yes (See Attachment #)No	•
B. If no, specify why decontamination/decommissioning is not considered necessary.	
Facility Decontamination/Decommissioning Plan is currently u	nder
preparation and will be submitted to the Department under se	parate cover.
3. Historical Data on environmental quality at the Industrial Establishment	
A. Were sampling results obtained on Environmental Quality for the Industrial Establishment	į
XX Yes (See Attachment #No	
B. If sampling results were obtained but are not part of this application, please explain below:	
	•
•	
4. List any other information you are submitting or which has been formally requested by the Dep	partment:
Description	Attachment =
	• .
	•
	•
FEE_CHECKLIST	
	• • • • • • •
include below a breakdown of the total fee submitted with this application. (See N.J.A.C. appropriate fees.)	7:26B-1.10 for the
phycoprame (eeg.)	
<u>Item</u>	Amount (5)
	,
1. Initial Notice Review	
i. Without Sampling Plan	
ii. With Sampting Plan that includes only underground storage tank analysis without groundwater monitoring	
iii. With Sampling Plan other than ii. above or iv. below	
iv. With Sampling Plan that includes any groundwater monitoring	7,500
2. Sampling Data Review	
3. Negative Deciaration Review	
4. Cleanup Plan Review	
5. Oversight of Cleanup Plan Implementation	
TOTAL FEE ENCLOSED	s <u>7,500</u>

ARE FEES ENCLOSED? XX YES

ARSYNCO, INC.

SITE EVALUATION SUBMISSION

LIST OF ATTACHMENTS

A	Operational and Ownership History - 2
É	Description of <u>Past</u> Operations - 2
c	List of Air Permits - 4?
Ď	1991 Generator Annual Report -3
É	Enforcement Actions for Violations-4
F	Site Plan = 2
G	Description of Operations - 2
H	Hazardous Substance and Waste _ 3 Containment Description
I.	Hazardous Substance/Waste Inventory -3
Ĵ	Discharge History of Hazardous -4 Substances and Wastes
ĸ	ECRA Form 002A ("Request for Hydrogeologic Assessment")
L	Historical Data on Environmental Quality -6

CERTIFICATIONS:

A. The following certification shall be signed by the highest ranking individual at the site with overall responsibility for that site or activity. Where there is no individual at the site with overall responsibility for that site or activity, this certification shall be signed by the individual having responsibility for the overall operation of the site or activity.

I certify under penalty of law that the information provided in this document is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et_seq., I am personally liable for the penalties set forth at N.J.S.A. 13:1K-13

Typed/Printed Name DSWNN V. SPACE	Tille PRESIDENT, AREYNICO /NE
Signature June VSpree	Date 3/23/93
Sworn to and Subscribed Before Me on this 23 htt	•
Date of Murch 19 93	
Notary NELL O. KEEVER NOTARY PUBLIC OF NEW JERSEY	

MY COMMISSION EXPIRES 1445, 14, 1985

B. The following certification shall be signed as follows:

- 1. For a corporation, by a principal executive officer of at least the level of vice president:
- 2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
- 3. For a municipality, State, Federal or other public agency, by either a principal executive officer or ranking elected official.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate, or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of N.J.S.A. 13:1K-6 et seq. I am personally liable for the penalties set forth at N.J.S.A. 13:1K-13

set forth at N.J.S.A. 13:1K-13		2 1.	,
Typed/Printed Name DENNIS V. SPACE	Title _	PRESIDENT, ARS	YNCO /M
Signature June Space	Date _	3/23/93	
Sworn to and Subscribed Before Me.		. •	
Date of MARCH 19 93			-
Notary Indiana			
EMILY ANDREWS	•		

NOTARY PUBLIC OF NEW MERCEY MY COMMISSION EXPIRES SUFF. S. 1993

ATTACHMENT A

OPERATIONAL AND OWNERSHIP HISTORY (ITEM 1.A. OF SES)

ATTACHMENT A OCCUPATIONAL AND OWNERSHIP HISTORY ARSYNCO, INC. ECRA CASE # 93024

	NAME	OWNER/OPERATOR	PROPERTY/TRACT*	FROM	то	OURRENT ADDRESS
1.	Arsynco, Inc.	Owner/Operator	Tracts 1 & 2	July 1969	Present	13th Street Carlstadt, NJ
2.	Inmont Corp. (formerly Interchemical Corp.)	Owner/Operator	Tracts 1 & 2	Dec. 1961	July 1969	unknown
3.	Fries Bros. Inc.	Owner/Operator	Tracts 1 & 2	Sept. 1945	Dec. 1961	unknown
4.	Commercial Sovents Corp.	Owner/Operator	Tracts 1 & 2	Oct. 1942	Sept. 1945	unknown
5.	PA. Alcohol and Chemical Corp. (formerly Franco-American Chemical Works)	Owner/Operator	Tract 2 Tract 1	June 1928 Dec, 1925	Oct. 1942 Oct. 1942	unknown
6.	Moses & Josephine Trubek	Owner	Tract 1	June 1.920	Dec. 1925	unknown
7.	Victor & Eugene King	Owner	Tract 1	?	June 1920	unknown
8,	Carlstadt Holding Corp.	Owner	Tract 2	Jan. 1927	June 1928	unknown
9.	Sarah Berry	Owner	Tract 2	?	Jan. 1927	unknown

NOTES * - Please refer to Site Plan for diagram of Block 91 / Lot 1 (Tracts 1 & 2).

ATTACHMENT A OCCUPATIONAL AND OWNERSHIP HISTORY ARSYNCO, INC. ECRA CASE# 93024

	P. P. S. P.	OWNER/OPERATOR	PROPERTY/TRACTE: L	FROM	T Q	CURRENT ADDRESS
1.	Arsynco, Inc.	Owner/Operator	Tracts 1 &2	July 1969	Present	13th Street Carlstadt, NJ
2.	Inmont Corp. (formerly Interchemical Corp.)	Owner/Operator	Tracts 1 &2	Dec. 1961	July 1969	unknown
3.	Fries Bros. Inc.	Owner/Operator	Tracts 1 & 2	Sept. 1955**	Dec. 1961	unknown
4 .	Commercial Sovents Corp.	Owner/Operator	Tracts 1 & 2	Oct. 1942	Sept. 1945	unknown
5.	PA Alcohol and Chemical Cor (formerly Franco-American Chemical Works)	Owner/Operator	Tract 2 Tract 1	June 1928 Dec. 1925	Oct. 1942 Oct. 1942	unknown
6.	Moses & Josephine Trubek	Owner	Tract 1	June 1920	Dec. 1925	unknown
7.	Victor & Eugene King	Owner	Tract 1	?	June 1920	unknown`
8.	Carlstadt Holding Corp.	Owner	Tract 2	Jan. 1927	June 1928	unknown
9.	Sarah Berry	Owner	Tract 2	?	Jan. 1927	unknown

NOTES *- Please refer to Site Plan for diagram of Block 91 / Lot 1 (Tracts 1 & 2).
**- Date revised from 1945 to 1955 based on new information

Revised: 3/5/98

ATTACHMENT B

BRIEF DESCRIPTION OF <u>PAST</u> OPERATIONS (ITEM 1.B. OF SES)

ATTACHMENT B DESCRIPTION OF PAST OPERATIONS ARSYNCO, INC. ECRA CASE # 93024

The Arsynco, Inc. property (Tract 1 only) has historically been operated as a chemical manufacturing plant. As indicated in the Occupational and Ownership history outline included as Attachment A, the property has been owned and operated by a variety of chemical companies since approximately the 1920s. As far as can be determined, the former operations conducted at the site since the 1920s when the property was owned and operated by the PA. Alcohol and Chemical Corp. (and possibly as far back as ownership by the Trubek's) consisted almost entirely of the manufacture of specialty organic chemicals and pharmaceutical intermediates.

Please note that based on the review of property history and aerial photographs, all operations conducted on this property appear to have been limited to Tract 1 only (see Site Map - Attachment F). There is no evidence of any operations ever being conducted on Tract 2.

ATTACHMENT C

LIST OF AIR PERMITS
NEW JERSEY BUREAU OF AIR POLLUTION CONTROL
(ITEM 2.A. OF SES)

PERMIT NUMBER	CERTIFICATE NUMBER	DATE OF APPROVAL OR DENIAL	REASON FOR DENIAL	EXPIRATION DATE
N/A	101884	Approved 10/31/90	N/A	4/17/93
N/A	107782	Approved 7/27/92	N/A	7/27/97
N/A	098255	Approved 8/30/90	N/A	11/22/96
N/A	097562	Approved 8/17/90	N/A	5/2/93
N/A	097970	Approved 10/5/90	N/A	9/29/96
N/A	049261	Approved 2/27/81	N/A	2/27/96
N/A	049262	Approved 2/27/81	N/A	2/27/96
N/A	103690	Approved 10/1/91	N/A	10/1/96
N/A	081964	Approved 3/2/88	N/A	3/2/98
N/A	049264	Approved 2/2/81	N/A	2/27/96
· N/A	049263	Approved 2/2/81	N/A	2/27/96
N/A	049268	Approved 2/2/81	N/A	2/27/96
N/A	049265	Approved 2/27/81	N/A	2/27/96
N/A	049270	Approved 2/27/81	N/A	2/27/96
N/A	104043	Approved 10/9/91	N/A	10/9/96
N/A	103150	Approved 10/1/91	N/A	10/1/96
N/A	049280	Approved 3/29/81	N/A	3/28/96
N/A	049260	Approved 2/27/81	N/A	2/27/96
N/A	105846	Approved 9/27/91	N/A	9/27/96
N/A	100578	Approved 3/22/91	N/A	3/22/96
N/A	049255	Approved 2/27/81	N/A	7/1/95
N/A	093410	Approved 12/15/89	N/A	12/15/94
N/A	103689	Approved 10/2/91	N/A	10/2/96
N/A	107249	Approved 6/25/92	N/A	6/25/97
N/A	049259	Approved 2/27/81	N/A	7/1/95
N/A	049257	Approved 2/27/81	N/A	6/30/96
N/A	049282	Approved 5/14/81	N/A	5/13/96
N/A	099516	Approved 1/24/91	N/A	1/24/96
N/A	066508	Approved 9/26/83	N/A	9/26/93
N/A	049271	Approved 2/27/81	N/A	2/27/96
N/A	094583	Approved 3/2/90	N/A	5/14/93

ATTACHMENT C LIST OF AIR PERMITS ARSYNCO, INC. APC PLANT ID #00098 ECRA CASE # 93024

PERMIT NUMBER	CERTIFICATE NUMBER	DATE OF APPROVAL OR DENIAL	REASON FOR DENIAL	EXPIRATION DATE
N/A	N/A	Applied for 1/21/93	N/A	NI/A
N/A	N/A	Applied for 1/11/93	N/A	N/A N/A
N/A	N/A	Applied for 1/30/91	N/A	N/A N/A
N/A	N/A	Applied for 2/4/93	N/A	N/A
N/A	N/A	Applied for 10/6/92	N/A	N/A
N/A	N/A	Applied for 1/21/93	N/A	N/A
N/A	109751	Approved 10/27/92	N/A	4/24/93
N/A	102189	Approved 7/12/91	N/A	4/1/93
N/A	099809	Approved 1/25/91	N/A	4/13/93
N/A	102191	Approved 7/12/91	N/A	4/1/93
N/A	107250	Approved 6/8/92	N/A	6/2/93
N/A	099518	Approved 2/22/91	N/A	5/11/93
N/A	099517	Approved 2/22/91	N/A	5/11/93
N/A	100617	Approved 3/15/91	N/A	6/1/93
N/A	040127	Approved 2/12/79	N/A	10/10/94
N/A	061574	Approved 6/30/82	N/A	6/30/97
N/A	065729 •	Approved 8/1/83	N/A	8/1/93
N/A	007361	Approved 6/6/74	N/A	6/6/94
N/A	105189	Approved 2/20/92	N/A	5/14/93
N/A	108057	Approved 7/30/92	N/A	4/25/93
N/A	108058	Approved 7/30/92	N/A	4/25/93
N/A	105190	Approved 2/20/92	N/A	5/14/93
N/A	105188	Approved 1/31/92	N/A	4/24/93
N/A	105043	Approved 2/20/92	N/A	5/14/93
N/A	105540	Approved 3/17/92	N/A	3/11/93
N/A	107781	Approved 7/27/92	N/A	7/27/97
N/A	105542	Approved 2/20/92	N/A	5/14/93
N/A	105541	Approved 2/21/92	N/A	5/15/93
N/A	101525	Approved 3/22/91	N/A	3/10/93
N/A	107161	Approved 6/16/92	N/A	3/12/93
N/A	102190	Approved 8/9/91	N/A	8/9/96
N/A	101885	Approved 7/5/91	N/A	3/25/93
N/Á	106265	Approved 4/28/92	N/A	4/22/93
N/A	102600	Approved 4/5/91	N/A	3/24/93
N/A	103691	Approved 10/16/91	N/A	4/7/93
N/A	098256	Approved 10/31/90	N/A	4/17/93
N/A	104107	Approved 12/17/91	N/A	3/10/93

PERMIT NUMBER	CERTIFICATE NUMBER	DATE OF APPROVAL OR DENIAL	REASON FOR DENIAL	EXPIRATION DATE
N/A	101884	Approved 10/31/90	N/A	4/17/93
N/A	107782	Approved 7/27/92	N/A	7/27/97
N/A	098255	Approved 8/30/90	N/A	11/22/96
N/A	097562	Approved 8/17/90	N/A	5/2/93
N/A	097970	Approved 10/5/90	N/A	9/29/96
N/A	049261	Approved 2/27/81	N/A	2/27/96
N/A	049262	Approved 2/27/81	N/A	2/27/96
N/A	103690	Approved 10/1/91	N/A	10/1/96
N/A	081964	Approved 3/2/88	N/A	3/2/98
N/A	049264	Approved 2/2/81	Ñ/A	2/27/96
N/A	049263	Approved 2/2/81	N/A	2/27/96
N/A	049268	Approved 2/2/81	N/A	2/27/96
N/A	049265	Approved 2/27/81	N/A	2/27/96
N/A	049270	Approved 2/27/81	N/A	2/27/96
N/A	104043	Approved 10/9/91	N/A	10/9/96
N/A	103150	Approved 10/1/91	N/A	10/1/96
N/A	049280	Approved 3/29/81	N/A	3/28/96
N/A	049260	Approved 2/27/81	N/A	2/27/96
N/A	105846	Approved 9/27/91	N/A	9/27/96
N/A	100578	Approved 3/22/91	N/A	3/22/96
N/A	049255	Approved 2/27/81	N/A	7/1/95
N/A	093410	Approved 12/15/89	N/A	12/15/94
N/A	103689	Approved 10/2/91	N/A	10/2/96
N/A	107249	Approved 6/25/92	N/A	6/25/97
N/A	049259	Approved 2/27/81	N/A	7/1/95
N/A	049257	Approved 2/27/81	N/A	6/30/96
N/A	049282	Approved 5/14/81	N/A	5/13/96
N/A	099516	Approved 1/24/91	N/A	1/24/96
N/A	066508	Approved 9/26/83	N/A	9/26/93
N/A	049271	Approved 2/27/81	N/A	2/27/96
N/A	094583	Approved 3/2/90	N/A	5/14/93

ATTACHMENT D

COPY OF 1991 GENERATOR ANNUAL REPORT (ITEM 2.C. OF SES)

Site Name	ARSYNCO,			INC.									
	P.	0.	Вс	x	8,	Ca	rls	ta	ıdt,	ŊJ	(<u> 7</u> 0	72
EPA ID No.	N	J	D	0	4	4	6	8	8	9	3	5	

OFFICIAL	USE ONLY
Ann. Fee	
RA	<u> </u>
Date	
Rec'd By	
•	

HAZARDOUS WASTE FACILITY 1991 FEE VERIFICATION WORKSHEET

1991 FEE VERIFICATION WORKSHEET						
NSTRUCTIONS: Complete the below fee category information. If your site is required to submit a fee, then attach the check were indicated.						
Attach check or money order here.						
Make Payable to:	Treasurer State of New Jersey					
Mail Report to:	NJDEPE, Bureau of Revenue CN417 420 East State Street					
	Trenton, NJ 08625-0417 Attention: Manifest Section					
Fee Category (Che	ck appropriate generator and hazardous waste facility status boxes.)					
No Fee	This site (company) manifested less than 1.33 tons of hazardous waste for the calendar year.					
\$200.00	This site (company) manifested 1.33 tons or more of hazardous waste but less than 10 tons of hazardous waste during the calendar year.					
\$300.00	This site (company) manifested 10 tons or more of hazardous waste but less than 100 tons of hazardous waste during the calendar year.					
X \$400.00	This site (company) manifested 100 tons or more of hazardous waste during the calendar year.					
X \$800.00	In addition to the above indicated generator status, this site (company) was a hazardous waste facility during the calendar year.					
\$ 1,200.00	TOTAL FEE SUBMITTED.					

BEFC ENTE	DRE COPYINER:	IG FORM,									
SITE	NAME	Foot o	o, INC.	St.	<u></u> 7			19	91 Hazardo	ous Waste	e Report
EPA I	D NO.		4 4 6 8	1 8 9 3 5			FORM IC	,	IDENTIFIC CERTI	CATION (FICATIO	
INSTR	UCTIONS	S: Read the c	letailed instruc	ctions beginning on p	age 6 of t	he 1991	Hazardous	Waste Repo	rt booklet bef	ore comple	ting this form.
SEC. 1				te items A through H. ent, enter information				A, C, E, F, G	, and H if san	ie as label;	if
A. EPA ID No Same as I	_	→			B. County		Berger	n			
C. Site/comp					D. Hasth	e site nam	e associated wi	ith this EPAID of	anged since 1986		1 Yes 2 No
Same as l		If not applicable, ent	er industrial park,	building name or other phys	ical location	descriptio	n.	 	_		
F. City, town Same as I			•		· · · · · · · · · · · · · · · · · · ·	G. State Same	as label 💭	H. Zip Code Säme as lab	4 [} -⊥		
SEC. II	Mailing add	dress of site. Ins	truction page	6							
A. is the ma	iling address th	e same as the location	n eddress?	1 Yes (SI 2 2 No (G	OP TO SEC.	•	•				
B. Number s	and street name	of mailing address	P.O.Box	c 8					- . . -		
C. City, town	ı, village, etc.		Carlsta	ıdt		D. State N	IJ	E. Zip Code (7072		
SEC. III	Name, titl	e, and telephone	number of th	e person who should	be conta	cted if q	uestions ari	se regarding	this report. I	nstruction p	age 6
À Piesse pri	Dillo	on .	First name James	и. Р.	Ęn	Cor virn		C. Telephone		3 3 - [Extension [21 3 2 3
SEC. IV	the service	Standard Industries rendered at the site. Instruc	e site's physic	on (SIC) Code that de al location. Enter mor	scribes the than or	ne princi ne SIC C	pal product ode only if r	s, group of p no one indus	roducts, prod try description	uced or dis n includes t	stributed, or the combined
A.	2 8	3, 4	8.	2,8,69	C.	i	, NA ,		D.	, NA	
SEC. V	system desi or persons v best of my k Resource C violations."	gned to assure to who manage the mowledge and b	hat qualified p system, or the elief, true, acc Recovery Act	ument and all attachn personnel properly gat use persons directly re urate and complete, for submitting false in	ther and e esponsible I am awa	evaluate e for gat re that th	the informa hering the i here are sig	ition submitte information, t nificant pens	ed. Based on he informatio Ities under Se	my inquing n submitte ection 3008	of the person d is, to the of the
· _,	ace	,	First name Denni	s		_	y.	a. Tate VP/Gen	eral M	gr	4.
C. Signature	Sum	N'Span						D. Date of sign		28.1 DAY	1912 J YR
		- 7							Ds	ge 1 of	29

BEFORE COPYING FORM, ENTER:						
SITE NAME ARSYNCO, INC						
P.O. BUX 8, FOOT OF 13 th ST. LARLSTANT N.J. 07072	· 1991 Hazardous Waste Repo					
EPAID NO. WOD DIYIY 6818 91315	FORM WASTE GENERATION AND MANAGEMENT					
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this t						
Sec. A Waste description PHARMACEUTICAL BYPROSULT IT	QLUENE ADDED					
B. EPA hazardous waste code DIDIDI/ FIDIDIST	C. State hazardous waste code Page 15					
WALL WALL WILL	WW. 1 1 1 1 1 VVIVI 1 1 1					
D. SiC ecce E. Origin code [/_] F. Source code	G. Point of measurement H. Form code L RCRA-radioactive					
Page 18 Fage 18 Fage 17	Pege 17 Page 17 Page 17					
Page 18 1/_	MM111-11-11 = MM1111-11-11					
Sec. A. Ousnitty generated in 1990 Il Instruction Page 18 B. Ousnitty generated in 1991 Page 18	C. UOM Density D. Did this site do any of the following to waste: treat on site, dispose on site, on site, or discharge to a sewer/POT					
111141010101.D1 111191716121.D1	Page 18 1 tes/Sei 2 te 2 to (Sigh to SEC. II)					
On-site system typo Quantity treated, disposed or recycled on site in 1991 Co	on-site system 2 In-site system type Cuantilly treated, disposed or recycled on site in 1981 age 19 M					
Sec. A. Was any of this waste shipped off site in 18917)X 5)					
Site E. EPAID No. of facility waste was shipped to C. System type shipped 1 Pegs 20 Page 20	D. Off-size availability code Page 21 E. Total quantity thipped in 1991 Page 21					
[[[[[[[[[[[[[[[[[[[<u> </u>					
Sits B. EPA ID No. of facility waste was shipped to C. System type shippe 2. Page 20 Page 20	Page 21 E. Take quantity shipped in 1991					
MO10 0105 484 2144 MO13121	V LIII R1610161					
	NTINUE TO BOX (I) IS FORM IS COMPLETE)					
E.D. Activity C. Other effects D. Cruentilly recycled in 1691 due to new oct Page 22 Page 22 Page 23	tivities E. Activity, production index F. 1991 Source reduction quantity Page 23 Ft. 124					
W						
Comments: SEC. I - H - FORM CODE BY9 - NON HA	AZARDOUS PHARMACEUTICAL BY PRODUCT					

Page 3 of

BEFORE COPYING FORM, ENTER: SITE NAME ANSYNCO, FA	· · · · · · · · · · · · · · · · · · ·					•
P.O. BOX8, FOOT OF13	T. GARLSTAN N.J. UTOTZ			199	1 Hazardous	: Waste Report
EPAID NO. WDD D投資 688 835 FORM GM WASTE GENERATION AND MANAGEMENT						
INSTRUCTIONS: Road the detailed i	instructions beginning on page 13 of	tha 19	91 Hazardous Waste F	leport	t booklet before	completing this f
Sec. A Waste description MINERAS	al oil/ISO BuTypic	4e1)) /IsoBuTyR	o Ph	YENONE	i personé dent mer igne der senderen Anterese den en igne der senderen
B. EPA hazardous waste code DIDIDI	WKLL		C. State hazardous væste o Page 15	code		
WKIII	MAILI MAILI	,	MAT		للا للا	V41111
D. SIC code Page 18 E. Crigin code [] Page 16 System type M. W. IA	F. Source code Page 17 [A 1 3 13]		G. Point of measurement Page 17	P	orm ecode rage 17 BKI/J	L FCRA-radicactive in Page 17
Page 18 Page 18	Page 18 1. WW 2. WW 2. WW 2. WW 2. WW					
Sec. A. Quantity generated in 1690 8.	. Quantity generated in 1991 Page 18		DM Deficity age 19 D17.0 □1 be/gal	اره	weste: treat on on site, or disch Fage 19	uny of the toflowing to the side, see arge to a sewer/POTW CONTINUE TO SYSTEM HOP TO SEC. III)
ON-SITE SYSTEM 1 On-site system type Quantity treated, 1 Fage 18 M	disposed or recycled on site in 1991 O	X-SITE S n-site sys age 19	Contraction of the Contraction o	tity traci	lad, disposed or rec	ycled on site in 1991
Sec. A. Was any of this waste shipped off site in 1891. Instruction Page 20	? \(\sum 1 \) Yes (CONTINUE TO BO \(\sum 2 \) NO (SNIP TO SEC, M)	OX EJ	Market State of State	Ret: Holivia	Marine Property of the Parish	
Site 8. EPA ID No. of facility waste was shipped to	C. System type shippe Page 20	ed to	D. Off-site mailability code Fage 21		otal quantity shipped	d in 1981
KH10 101410 1519	K1316		ι <u>ζι</u>	!	- 	10,6666.
Site B. EPAID No. of facility westerwas shipped to Fage 20	C. System type shippe Page 20	id to	D. Off-site evallability code Page 21		olel quartity shipper lage 21	d in 1931
MA.	A CONTRACTOR OF THE CONTRACTOR	E SAL MARIE OF A				
Sec. A Dia new estimites in 1691 result in minimization IV kastruction Page 22			TO BOX 63			
B. Activity C. Other effects Page 22 Page 22	D. Quantity recycled in 1891 due to new act	hities	E. Activity/production inde Page 23	*	F. 1591 Source red Page 24	uction quantity
Comments:	Addition to the state of the st	TANKE in dead	till til till delikar frederindskalen och fillster der end av till de		PRINCIPAL CONTRACTOR	the state of the s
THE RESERVE OF THE PROPERTY AND THE PROPERTY OF THE PROPERTY O	ki zazereko (h. 1907) Alamanen zerekon hilizen bistatagan handalaj	بالمتنب حيثت	ত বিশ্ব পৰা শিশুন্ত কৈ নিৰ্ভাগ বিশ্ব ব	शं करी _, बक्त कृष		500 <u>4</u> 0i

BEFORE COPYING FORM, ENTER:					
SITE NAME ANSYMOD, INC.	•				
P.O.BOX8, FOOT OF 13-55, CARLSTAN, N.J. 07072	1991 Hazardous Waste Repor				
EPAID NO. WIND 61414 686 81315	FORM WASTE GENERATION AND MANAGEMENT				
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this f					
Sec. A. Waste description Instruction Page 15 XYUENE					
B. EPA hazardous waste code FOIDS WILL Page 15	C. State hexardous weste code Page 15 VVI/H VVI/H				
O. SiC code Page 18 Page 18 Page 18 Page 18 System type IM WK1 IA 13 17	G. Point of measurement H. Form code Page 17 Page 17 Page 17				
	Page 18 1. 1/13/19-12 MH 1-1-1-1				
Sec. A Quantity generated in 1990 B. Quantity generated in 1991 C. UOM Density D. Did this site do any of the following to t waste: treat on site, or discharge to a sewer/POTW Page 18 Page 19 The continue to system type Quantity treated, disposed or recycled on site in 1891 On-site system type Quantity treated, disposed or recycled on site in 1891 Page 19 Mill Mill					
Sec. A. Was any of this weste shipped off site in 1991? If I Yes (CONTINUE TO BO If I No (SKIP TO SEC. M)	X B)				
Site B. EFA ID No. of facility weste was chipped to C. System type shippe Page 20	d to D. Off-site availability code E. Total quantity shipped in 1981 Page 21 Page 21				
KAIO 01810 /1518 41316 11110161/1	الا لــــــــاعلائك،				
Site 3. EPA ID No. of facility waste was shipped to Page 20 Page 20	d to D. Off-size availability code E. Total quantity shipped in 1991 Page 21				
MA I MANAGEMENT OF THE PROPERTY OF THE PROPERT					
	YTINUE TO BOX B) FORM IS COMPLETE)				
B. Activity C. Other effects D. Cuantity recycled in 1991 due to new act Page 22 Page 23	Miles E. Activity/production index F. 1891 Source reduction quentry Page 23 Page 24				
Comments:	territoria de la composition de la comp La composition de la				

	-		maintin since			
BEFORE COPYING FORM, ENTER: SITE NAME ARSYNCO, INC.					• .	
P.O. BOX8, FOUTOFB \$5T. CANGTANTINIT. 07072			19	91 Hazardous	s Waste Report	
EPAID NO. WOW 01414 688 91315 FORM GM WASTE GENERATION AND MANAGEMENT						
INSTRUCTIONS: Road the detailed instructions beginning on page 13 of	the 1991	1 Häzardous Was	te Papo	rt booklet before	completing this f	
Sec. A. Waste description LOW LOW HEHIIS FROM ISOBUTY	yRoPi	HENONE				
B. EPA hazardous waste code DIOIOI WWII	,	C. State hazardous wi	este code			
MARITI MARITI		VŽ V	411	<u> </u>	141111	
D. SIC code Page 18 E. Origin code [] Page 18 F. Source code Page 17 [A 13 13 1		G. Point of measurem Page 17		Form code Page 17 IB R 1/ 191	L RCRA-radioactive r Page 17	
	LLJ. WKI		2 V Y J∙∐	14 - 5. (V)41		
propriete	C. UCI. Pag	0 19	i	waste: treat on on site, or disci Page 19 1 Yes	any of the following to to alle, dispose on alle, to harge to a sewer/POTW (CONTINUE TO SYSTEM SKIP TO SEC. EI)	
Page 19 Page 19	ego 19		لــا			
Sec. A. Was any of this waste chipped off site in 1991? III 1 Yes (CONTINUE TO BO Incruction Page 29	OŘ B)					
Site II. EPA ID No, of facility would was shipped to C. System type shipped 1 Fage 20 Page 20	nd to D.	Off-site availability co Page 21	de E	Total quantity shippe Page 21	nd In 1991	
	nd to D.	Cff-site availability co	ose E.	Total quantity shippe Ps 29 21	<u> </u>	
WALLELL WILLE	1.731.7.11.11.11.11.11.11.11.11.11.11.11.11.					
Sec. A Old new activities in 1031 recurs to minimization of this waste? If Yes (CO) N Instruction Page 122		SOX B)	PERSONAL PROPERTY AND ADMINISTRAL	uma var. vas individuali ir ni vadinini ir na mar. us	ikiterinden die des destablikations in de	
B. Activity C. Other clients D. Quantity recycled in 1991 due to new cot FEGN 22 Page 23		E. Activity/production Fegs 23	insex	F. 1501 Source re Fage 24	duction quantity	
[MT MT 5 %0	ليا،	<u></u> ,_				
Comments: SEC. I - H - MINERAL OIL HAID TSUB	UTYR	O PHENON	A COMME			

BEFORE COPYING FORM, ENTER:						
SITE NAME ARSYNLO, INC.						
P.O. Box 8, FOUT OF 13 4 ST. CHINISTANT, N.J. 07072	1991 Hazardous Waste Report					
EPAID 110. WIJID 101414 61818 181315	FORM WASTE GENERATION AND MANAGEMENT					
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this f						
Sec. A. Weste description LAB-PACK - WHSTE SUBJUMS	CYANIDE SOLID, POISONB					
B. EPA hezerdous waste code PI/1016 WI/A 1	C. Sista hazardous waste code Page 15					
WALL WALL WALL	LIC1410161 W1/41					
D. SIC code E. Origin code F. Source code Page 18 Page 17	G. Point of measurement H. Form code L. RCPA-radioactive r					
121813181 System type 1M1/VISI 1A19181	N BIDIDN F					
J. Reported Tri constituent Page 18 K. CAS numbers Page 18 1. Wild	Page 18 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.					
INNERCOR MATACON CONTROL CONTROL AND ANALYSIS OF CONTROL AND	CONTRACTOR OF A PARTY STREET CONTRACTOR OF A PARTY STREET CONTRACTOR OF A PARTY STREET CONTRACTOR OF A PARTY S CONTRACTOR OF A PARTY STREET CONTRACTOR OF A PART					
Sec. A. Quantity generated in 1990 II instruction Page 18 Page 18	C. UOM Censity D. Did this site do any of the following to t waster: treat on site, dispose on site, re on site, or discharge to a sever/POTW					
MA-11-11-11-11-11-11-11-11-11-11-11-11-11	Page 18 1 Yes (CONTINUE TO SYSTEM 1 Iba/gai 2 sg 2 No (SKIP TO SEC. 21)					
CN-SITE SYSTEM 1	W-SITE SYSTEM 2					
	n-site system type Quantity treated, disposed or recycled on sits in 1991 age 19					
Sec. A. Was any of this waste shipped off site in 1981? If yes (CONTINUE TO BE 2 No (SKP TO SEC. M)	άχ ε)					
Site 8. EPA ID No. of facility waste ives shipped to C. System type shipped 1 Page 20 Page 20	D. CVI-site availability code E. Total quantity shipped in 1991 Page 21					
PAN 01812 101813 1918 1111 118131						
Site B. EPA ID No. of facility exists were chipped to C. System type shipped 2 Page 20 Page 20	D. Cif-see are lability code E. Total quantity shipped in 1991 Page 21					
Sec. A Did nevi ectivities in 1601 result to minimization of this waste?	NTINUÉ TO BOX E) R FORM IS COMPLETE)					
B. Astroly C. Critist effects D. Quantity recycled in 1901 due to new ac Page 22 Page 23	livilles E. Activity/production index F. 1991 Source reduction quantity Fluga 23 Fago 24					
	indicated and an article in the control of the cont					
	namentalen kontrolera internamentalen en en kontrolera alla en					

BEFORE COPYING FORM, ENTER:	DO NAMES AND AND ASSESSMENT OF THE PARTY OF				·
SITE NAME ARSYNICO			•		
P.U.BOX8, FOU OF 1	3 4 ST., CANISTANTAL TO		19	991 Hazardous	s Waste Report
•	1688 1813151	FORM GN	V	VASTE GENE MANAGI	
INSTRUCTIONS: Road the detaile	d instructions beginning on page 13 of t	the 1991 Hazard	ous Waste Repo	ort booklet before	completing this fo
Sec. A. Waste description Instruction Page 15	- SULFURIC ALID				
B. EPA hazardous waste code		C. State r.	ezaidous weste code S	,	
WWLL	WALL WALL		WALL		<u> </u>
D. SIC code E. Origin code / Page 18	F. Source code Page 17	G. Point o		Form code Page 17	L RCRA-radioactive m Page 17
RIFIS FI System type IMVV	الكالم الم	•	1/1	18/10/41	립
J. Reported TRI constituent K. CAS nur Page 18 Reported Page 19	nbers 1. L.17161	64.93	·9 2 1/2	<u> </u>	لـا - لـــــــــــــــــــــــــــــــــ
3. 4	الماليانانانا الماليان	WU I I		5. MU	
Sec. A. Quaritity generated in 1990 Instruction Page 18	B. Ouanity generated in 1991 Page 18	C. UOM De Page 19	nsity	waxte: treat on on site, or disch	any of the lollowing to the ate, dispose on site, rectarge to a sever/POTV/?
1010101010101010101	11111313101101		5. 2.41 ⊠1 10a/şai □2.19		CONTINUE TO SYS (EM
CN-SITE SYSTEM 1 Cn-site system type Quantity troate	,	SITE SYSTEM:2	Cuantity (realed, disposed of tec	cycled on site in 1991
Pege 19	Pag	9e 19			
Sec. A. Was any of this waste shipped off site in 15		(9)	A THE STATE OF THE	en e	nichter († 1914-ben der Schafte) Die Gester († 1914-ben der Schafte)
Instruction Page 20	2 No (SKIP TO SEC. M)		·		
Site B. EPAID No. of facility waste was shipped to Fage 20	C. System type shipped	D. Off-site at Page 21	milability code E.	Total quantity shippe Page 21	d in 1981
PAID 685 68	10121315 MY151371	<u></u>	<u>'</u>	<u> </u>	1.131311.1
Site B. EPAID No. of facility waste was Shipped to Page 20	C. System tyre shipped Page 20	Page 21	zilability code E.	Total quentity shippe Fage 21	ed in 1891
WA L				1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ادلیلیا،
Sec. A Old new schelles in 1901 result in minimize V Instruction Page 22		TINUE TO BOX B)	,		
B. Acthity C. Other effects Pegu 22 Fag: 22	D. Countity recycled in 1601 due to new activ		(production index	F. 1891 Source res Page 24	auction dusinity
			LJ. LJ		<u></u>
Property and the second section of the section of the second section of the section of the second section of the section of t	ers i vale di stadi e i reta di propositati serin i stadi natera ni i si di sactionali esti desti visto di Parri mandatari di mandatari di disenti sa di separa di separabani, servati ngi mada di secondi.		of Tables and Control of Tables and Control of the	ar İstaniya yalın ayalı kalındır. Aliyadır. Ağırındır. İstaniya yalındır. Ağırındır. Ağırındır. Ağırındır. Ağırındır. Ağırındır. Ağırındır. Ağır	akidhan 400 terramen panasasi Anishin tarihi 1800 kanadasia pin
Comments:	entropologica (n. 1884), kan kan kan kan kan kan kan kan kan kan	an and an annual section of the sect	(NASA) Yang Yang Makang Kangang Ang	MINISTER ASSESSMENT CONTRACTOR	ine approximate a promising of court
					ore & of

				_	
BEFORE COPYING FORM, ENTER:					•
SITE NAME ARSYNCO, INC.		. •	•		
P.O.BIXE, FOOT OF 13 ST., CARLSTADINI,			199	91 Hazardous	s Waste Report
EPA ID NO. WOTID 01414 61818 91315	ADRESS	FORM	W	ASTE GENE MANAGI	RATION AND
	-				
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 19	91 Hazardous Was	te Pepoi	rt booklet before	completing this f
Sec. A Waste description Sec. 1 Sec. N. A. Waste description Instruction Page 15 YELLO IV PIGMENT RESIDUE		n maganing ang maganan ang maganan ang maganan ang maganan ang maganan ang maganan ang maganan ang maganan ang			
9. EPA hazardous weste code AAA WAA	:	C. State hazardous ve Page 15	iste code	·	
MALLI WALLI WILLI		L	<u> (13</u>	गक्षाक्ष	1 1 1 2 1 2 1 3 1
D. SIC code Page 18 E. Origin code L Page 18 F. Source code Page 17 LA 13 15		G. Point of measurem Page 17		Form code Page 17 B 7 0 9	L RCRA-radioactive to Page 17
	85 N41		2 1/1	/ / ! - - - -	
	C. UC				any of the following to the
Sec. A Quantity generated in 1990 B. Quantity generated in 1891 Page 18 Page 18	Pa	19 (2) (1)		waste: treat on on site, or disch Page 18	site, dispose on site, ret large to a sewer/POTWS CONTINUE TO SYSTEM
CN-SITE SYSTEM 1	N-SITE S	YSTEM 2	∏S að	≥ 2 140 (S	SKIP TO SEC. EIJ
	n-sile sys Ege 18	•	•	ated, disposed or rec	cycled on site in 1991
		MLLL	المسادة ومعروب المرادة ومعروب		
Sec. A Was any of this waste shipped off site in 1991? III Instruction Page 20)X B)				•
Site B. EPA to No. of facility weste was shipped to C. System type shippe Page 20 Page 20	d to [D. Cif-sile availability co. Page 21		Total quantity shipped Page:21	d in 1801
PAID 0185 61910 51812 111/13121		1/1			B810101.1
Site B. EPA to No. of Locility waste was shipped to Page 20 Page 20	dto (D. Off-site availability co. Page 21		Total quantity shippe Page 21	d in 1931
MA L	Section of the Control of the Contro		ATACA		1 1 1 1 1
Sec. A Did now activities in 1991 result in minimization of this waste? [V] Instruction Page 22		O BOX D) B COMPLETE)			
B. Asihity C. Cither billetts D. Quentity recycled in 1691 due to new act Page 22 Fage 22 Page 23	reliez	E. Activity/production Pege 23	index	F. 1981 Source rec	iuction quantity
WI WI	لـا.		_i		
The resonant section of the section	CHESTER IN THE	on and distributed and the case of the state	Andria-section	n factivity war verste varieties zijn vert	Constant was a series of the s
Comments:					
Bay meanumentations and autopose as the historian manument of the services and are considered to the construction of the construction of the historian manufactures and the construction of the construction o	- 6-2- 3-3-5 -1-2-1	e ni ni proposition, s'un em tres franços	National Control	والمراجع والمحاصر بالمحاضرة	GOOD CHEET WAS A CONTRACT OF

EPAID NO. WIJID 01414 61618 2315 FORM WASTE GENERATION AND MANAGEMENT INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Viasta Report booklet before completing this form the state of th	e to programme and a transfer and from the first fields are transfer and the contract of the c	
STE NAME ### PARTY NO. ### PARTY N		
PALID NO. WITTO DIFFY S. CARLOTARDIS 07072 EPAID NO. WITTO DIFFY S. CARLOTARDIS 07072 EPAID NO. WITTO DIFFY S. SALES S. CARLOTARDIS 07072 EPAID NO. WITTO DIFFY S. SALES S. CARLOTARDIS 07072 EPAID NO. WASTE GENERATION AND MANAGEMENT INSTRUCTIONS: Read the dataled instructions beginning on page 13 of the 1991 Hazardous Waste Report bookled before completing this 1 Sec. A. Weste encoder. Page 12 B. C. Date hazardous waste code Page 13 C. Date hazardous waste code Page 13 C. Date hazardous waste code Page 14 C. Date hazardous waste code Page 15 C. Date hazardous waste code Page 16 C. Date hazardous waste code Page 17 C. Date hazardous waste code Page 18 C. Date hazardous waste code Page 18 C. Date hazardous waste code Page 18 C. Date hazardous waste code Page 19 C. Dat		
FORM Call	P.O. BOX8, FOOT OF 13 5T. CARLITANTINIS. OYUTZ	1991 Hazardous Waste Report
Sec. A Waste description instruction Page 15 B. EPA hazardoos wards cocks Page 15 B. ECA hazardoos wards cocks D. SO code Page 15 B. ECA page 16 B. Cognition of machine page 17 B. ECA page 16 B. Cognition of machine page 17 B. ECA page 17 B. ECA page 18 B. Cognition of machine page 18 B. Cognition of machine page 18 B. Cognition of machine page 18 B. Cognition page 18 B. Cognit		WASTE GENERATION AND
B. EFA hazardosa waste code Page 13 C. State hazardosa vaste la C. C. C. C. C. C. C. C. C. C. C. C. C.	INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous Y/asta Report booklet before completing this fo
B. EPA hazardous waste code Page 15 W.A. W.A. W.A. W.A. W.A. W.A. W.A. W.A	Sec. A Waste description 1, 4 DICHLORD BUTEHE OFF SPEC. 1, 4 DICHLORD BUTEHE	
D. SC code Page 16 Page 16 Page 17 Page 18 Page 19 Page 20 Page 21 Page 21 Page 21 Page 21 Page 21 Page 21 Page 21 Page 21 Page 22 Page 22 Page 22 Page 22 Page 22 Page 22 Page 22 Page 22 Page 22 Page 22 Page 22 Page 22 Page 22 Page 24 Pag	B. EPA hazardous waste code 1010101/1 W14111	Page 15
Page 18 3. Wild	D. SIC code E. Origin code F. Source code Page 16 Page 18	Fage 17 Page 17 Page 17
III Instruction Page 18 Page 19 variety treated at the disposed or several Property of the result of the disposed or recycled on site in 1891 CN-SITE SYSTEM 1 On-site system type Page 19 CN-SITE SYSTEM 2 On-site system type CN-SITE SYSTEM 2 On-site system type CN-SITE SYSTEM 2 On-site system type CN-SITE SYSTEM 2 On-site system type CN-SITE SYSTEM 2 On-site system type Do-site system type CN-SITE SYSTEM 2 On-site sys	Page 18 Page 18 1. WYF	
Condition system type Page 19 Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Was any of this waste shipped off site in 1891? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Sec. A. Call new activities in 1991 result in minimization of this waste? Se	Il Instruction Page 18 Page 18	Page 19 waste: treat on site, dispose on site, red on site, or discharge to a sewer/POTW/Page 19 1 Yes (CONTINUE TO SYSTEM
III Instruction Page 20	On-site system type Quantity treated, disposed or recycled on site in 1991 Or Page 19	n-site system type Cuartity treated, disposed or recycled on site in 1981 type 19
Page 20 Page 21 Page 22 Page 22 Page 23 Page 23 Page 24 Page 24 Page 24		IX B)
Sito B. EPAID No. of facility weste was shipped to Page 20 Page 20 Page 20 C. System type shipped to Page 21 Page 21 Page 21 Page 21 Sec. A Cid new activities in 1991 result in minimization of this weste? IV Instruction Page 22 D. Cuentity recycled in 1991 due to new activities E. Activity/production areax F. 1991 Source reduction quantity Page 22 Page 23 Page 24 Will Will 1 Yes Will Will 2 No	1 Page 20 Page 20	Page 21 Page 21
Sec. A Cid new cethilise in 1991 result in minimization of this wester? IV Instruction Page 22 Q. Activity C. Other crieds D. Cuentily recycled in 1991 due to raw activities E. Activity/production areax F. 1991 Source reduction quantity Page 22 Page 22 Page 23 Page 24 W W 2 No	Sito B. EPAID No. of facility weste was shipped to C. System type shipped Page 20	d to D. Off-Life availability socie E. Total quantity shipped in 1991
Page 22	Sec. A Cid new activities in 1991 result in minimization of this waste?	
WILLIAM IV I I I I I I I I I I I I I I I I I I		
T.	}	nderfilm time for a social section in the section is the section and section and section and section and section is a section of the section is a section of the section is a section of the section is a section of the

	ecaraera.	and a street light net sexual sense is set it is a remarkable commen	Contraction and Section (Special Con-	CONTRACTOR OF THE PROPERTY OF
BEFORE COPYING FORM,		•		
SITE NAME ADSYNCO, THE-				
P.O.BOXE, FOOT OF 13 ST. CARLSTAOTING, DTUY 2			1991 Hazardou	s Waste Report
1	Cariconnai	PO DA I		
EPAIDNO. WIJID 10141416816 1315		FORM	WASTE GENE	RATION AND
		GM	MANAG	EMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1S	91 Hazardous V/asto R	eport bocklet before	e completing this f
			an înstituit en in minain pintituit d	and the state of t
Sec. A Wester description Instruction Page 13 ORTHO - CHLORO TOLUENE / METHANO	L			
B. EPA hazardous waste code F1010131 WV-11		C. State hazardous waste o	code	
WALL WALL WHILL		كليا	21/18131 14	4ALLL
D. SC code E. Origin code L. F. Source code Page 16 Page 17		G. Point of measurement Page 17	H. Form cude Page 17	L RCRA-radioactive ra Page 17
RIEBIZI System type IMWAII IAISIZI		4	18121014	링
J. Reported TRI constituent K. CAS numbers Page 18 Page 18 1.	67	1.561.61 2	NiA III	
.	1/1/1		J 5. AVAL	
Sec. A. Quantity generated in 1990 B. Quantity generated in 1991 Page 13	C. U.	OM Censity age 19	weste: treat on	any of the following to the
10	1 12	51 DK.L	Page 19	harge to a sewer/POTW (CONTINUE TO SYSTEM
		1 lbs/çul		SKIP TO SEC. III)
On-site system type Quantity treated, disposed or recycled on site in 1561 On	-site sys	rystem 2 dem type Cuant	ity treated, disposed or re-	cycled on site in 1691
Page 19 Pi	19e 18	MLLL		
Sec. A. Was any of this waste shipped off site in 1991?		grang general variabet seller en en en en en en De populare de l'Endret seller en en en en en en	origen ja kai 1900 (1904) Karanda marja ja manda milata Arrian milata di Prilitz (1904) Arria Maria di Arria Maria Maria Maria Maria Maria Maria Maria Maria Maria Mar	CELLER STATE OF THE STATE OF TH
III Instruction Page 20 2 No (SKIP TO SEC. M)				
Site B. EPA ID No. of lacility waste was shipped to C. System type shipped to Page 20 Page 20	d to 1	D. Off-site availability code Page 21	E. Total quantity shippe Page 21	d In 1991
WID ODR 454 544 MOBRY		山		13131291.1
Site B. EPA 10 No. of facility waste was shipped to C. System type shippe 2 Page 20 Page 20	d to	D. Off-site availability code Page 21	E. Total quantity shipps Page 21	ed in 1891
SGC. A Did now activities in 1931 tresult in minimization of this waste? [1] 1 Yes (CO) [V] Instruction Page 22		TO BOX B) S COMPLET E)	AN AND STOCKERS AND AND AND AND AND AND AND AND AND AND	
C. Other effects D. Countity recycled in 1601 counts new ect Page 22 Fage 22 Page 23	Nities	E. Activity/production inde	x F. 1991 Source re-	duction geentily
	اــا			<u></u>
	Marianon indi	ACCOMMENDED STANDARD AND ACT OF STREET STANDARD AND	The state of the s	Zarodor lätt de lanvaden de opsaklatione
Comments:	arreligio dell'	encommental la compressión de la compressión de la compressión de la compressión de la compressión de la compre	remit Juditik shirkini shirini pilitera 252	, and the second second second second second second second second second second second second second second se
CAN CONTROL OF THE ACCOUNTS AND THE SECOND OF THE SECOND O	uradistrii.	it y Brodrich Island arabitan katalon dia dia dia dia salah di		
				,atto TT of

BEFORE COPYING FORM. ENTER:					
SITE NAME ARSYNCO, FAC					
P.D. 180 x 8, FOTOF 13 55. CHRISTANT, NIJOTO)2	1991 Hazardous Waste Report				
EPA 10 110. WOW 61814 61818 91315T	FORM WASTE GENERATION AND MANAGEMENT				
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous Waste Report booklet before completing this fo				
Sec. A Waste description instruction Page 15 OFF SPEC. 1,1,1 TRICHZUR	OFTHALE				
B. EPA hazardous waste code FIDIDIZI WW. I	C. State hezardous = ste code Page 15				
WALL WALL	<u> </u>				
D. SiC code Page 18 Page 18 Page 18 Page 18 Page 17 Land System type March Marc	G. Point of measurement H. Form code Page 17 B 2 10 2 12 12 13				
J. Reported TRI constituent K. CAS numbers Page 18 Page 18 1.	71/1.53-61 2 W/4111.LI.LI				
	MALLI-LI-LI 5. WALLI-LI-I				
Sec. A Curnity generated in 1690 Il Instruction Page 18 B. Quantity generated in 1691 Page 19 C. UOM Density Page 19 D. Old this sate do any of the following to waste: treat on site, dispose on site, non eite, or discharge to a sewier/POTM Page 19 1 Yes (CONTINUE TO SYSTE					
On-site system type Quantity treated, disposed or recycled on site in 1901 Co	On-site system type Quantity treated, disposed or recycled on site in 1991 Consite system type Quantity treated, disposed or recycled on site in 1991 Page 19				
Sec. A. Was any of this waste shipped off site in 1991? Instruction Page 20 2 No (SKIP TO SEC. M)	OX B)				
Site B. EPA ID No. of facility waste was chipped to C. System type chippe Page 20 Page 20	id to D. Off-site availability code E. Total quantity shipped in 1691 Page 21				
WIJIO 01012 41514 5414 IMOBRI	را ليايا بي الان الان الم				
Site S. EPAID No. of facility waste was shipped to Page 20 Puge 20	D. Off-site availability code E. Total quantity shipped in 1991 Page 21				
	NTINUE TO BOX (1) FORM IS COMPLETE)				
B. Activity C. Other effects D. Quantity recycled in 1691 due to new act Page 72 Fage 22 Fage 23	ibilities E. Activity/production index F. 1921 Source reduction quantity Page 24				
W W					
Comments: SEC. 14- CFF SPEC. 1/1/TRICHISPOSTHANE SEC	C. III - C - RELOVERY OF 11/1 TRICHLORDETHAN				

BEFORE COPYING FORM, ENTER:			
SITE NAME ARSYNCU	T, CARLSTANTIVI, J. 07072	·	1991 Hazardous Waste Repo
EFAIDNO. WITD 0144	61818 8315	FORM GM	WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed in	nstructions beginning on page 13 of the	1991 Hazardous Waste R	eport booklet before completing this
Sec. A. Waste description Instruction Page 15 OFF SPEC.	CHLORO FORM		
B. EPA hazardous weste code Page 15 WIALL	WIALL MALL	C. State hazardous waste c Page 15	-117161 VIA 1 1 1
D. SiC code E. Origin code [] Page 16 Page 18 System type [M F. 1/4]	F. Source code Page 17 All [A 1517]	G. Point of measurement Page 17	H. Form code Page 17 BIZI/191 L RCFA-radioactive Page 17 X
J. Reported TRI constituent Page 18 3. Will	1. [] [6]	71.6161.31 2 A.L.L.L.L	W14
Sec. A. Quantity generated in 1990 B. Instruction Page 18	Quantity generated in 1991 Page 18	Density Fige 19 Density Fige 19	
CN-SITE-SYSTEM 1 On-site system type Ouantity treated, di Page 19 [M]	isposed or recycled on site in 1991 On-site Page 16		ity treated, disposed or recycled on site in 1991
Sec. A. Was any of this waste shipped off site in 1991?	1 Yes (CONTINUE TO BOX B) 2 NO (SKIP TO SEC. M)	A THE WASHINGTON TO THE STREET OF THE STREET OF THE STREET OF THE STREET OF THE STREET OF THE STREET OF THE ST	tivith Live Hammerca, and Challach Live Yandro All The Chall The Challach Hay com Pedia and the
Site B. EPA ID No. of facility waste was shipped to Page 20 WDW 01013 4514	C. System type shipped to Fage 20	D. Off-site availability code Page 21	E. Total quartity shipped in 1691 Page 21
Site B. EPA ID No. of facility weste was shipped to Page 20	C. System type shipped to Page 20	D. Off-site evallability code Page 21	E. Tatal quantity shipped in 1981 Page 21
Sec. A Old riow activities in 1991 result in minimization		•	TO THE REAL PROPERTY OF THE PR
W Instruction Page 22 H. Activity C. Other effects Page 22 Fage 22	D. Chunnity recycled in 1991 due to now activities Page 23	M IS COMPLETE) E. Activity/production Index Fege 23	F. 1691 Source reduction quantity Page 24
	And a second sec		
Comments: HI OFF SPECI CHE	LONDFURIN, SECTE C- RI	ECOVERY OF CHLOR	inder de seule aine de considerant une de considerant de considerant de considerant de considerant de considera LOFORMA

DEFORE COPYING F	ORM,							
SITÉ NAMÉ	ARSYMCO, I	WC.	·		-	•		
Poubo	X8, FOOT OF 13	ST, CARLS	TAOTALT.			. 19	991 Hazardous	s Waste Report
1	אוזיםן (סיגיאן (, , , , , , , , , , , , , , , , , , ,		form GM	١	WASTE GENE MANAG	• •
INSTRUCTIONS	Read the detailed in	structions begin	ning on page 13 of	the 19	91 Hazardous V	/aste Rep	ort booklet before	completing this fo
Sec. A Waste description Instruction Page		RQ WAST	= FLUMMUM	UF L	Muis Po	1 (442)	us IV oss	na finales e professione del Maria de la recursión de la recur
E. EPA hazardous waste code			chloroanilin.		C. Stele hazardou			
Page 15		WWLL	WHI I		Page 15	119	516191 L	1 161/16191
Page 18	Origin code	F. Source coo	1A 19141		G. Point of measures 17	rement H	Form code Page 17	L RCRA-radioactive rr Page 17
J. Reported TRI constituent Page 18	K. CAS numbers Page 18 3. VA		1. <i>XV V</i> 4-1_1 	NAI	J. L. J L. J	2 K	WALLER MAL	
Sec. A Quantity general Instruction Page		Ouersity generated in Page 13	1/14151.0	١,	ago 18	• [waste: treat on on site, or disc! Page 19	any of the following to it is as, dispose on site, recharge to a newer/POTW: (CONTINUE TO SYSTEL SKIP TO SEC. III)
ON-SITE SYSTEM I On-site system typo Page 19 [M] []	ON-SITE SYSTEM 2 On-site system type Ouantity treated, disposed or recycled on site in 1991 Page 19 On-site system type Ouantity treated, disposed or recycled on site in 1991 Page 19							
Sec. A. Was any of this	waste shipped off site in 1591?	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	Yes (CONTINUE TO BO No (SKIP TO SEC. M)	X 9)	en en en en en en en en en en en en en e		an a deligió meio auro de altituda de la como	
Site 8. EFA 10 No. of Pege 20	facility waste was shipped to		C. System type shipper	d to	D. Off-site availabilit Page 21	y coos E	. Total cuantity shippe Page 21	ed in 1501
PAID	0.85 680	5AK	1410141/1		<u>L</u>	<u>. </u>		١٠ <u>١٤/٢ / ١</u>
Site B. EPAID No. of	facility waste was shipped to		C. System type shippe Page 20	d to	D. Off-site availabilit Page 21	γ c⇔ce E	Total quantity shippe Page 21	id In 1991.
NA	THE CONTRACT OF SOME ANY TO SOME		<u>בביווט</u>	D14:0728-00				
N Instruction Page	es in 1991 result in minimizu en e 22	of this wester	1 Yes (CO)		TO BOX B) S COMPLETE)	. Mir. Tr. Elementi	ing the second control of the second control	ARTHGOMATION OF THE ANGEST AMERICAN
B. Activity Page 22	C. Other effects Figo 22	D. Chinality recycle Plage 22	ed in 1901 due to new act	Mics	E. AciMty/produc Page 23	tien ipres	F. 1791 Source re	dustion quantity
	Yes			.[_]	النا،	ш.		
Comments:	of Chicago and Chi	e die entre de la company de l	ert, ett vilke get i desploitele it. ett ett i skrivet i skrivet i De skrivet for desploitele ett ett i skrivet i skri De skrivet for desploitele ett i skrivet	Mariana Mariana	e-trongenter (f. 1944) A tipo tar Alland (f. 1944)	ialdir stiffin et tizikt ti Klaifen adalt ili situation	. Sec 1847 - Albert Berger, Albert B	kiya tanasan kawasan sasasan ajar Kiya tanasan kawasan sasasan ajar
CONTROL OF STATE OF S	i COV sa sene Seste Colo ne de Colone (COV).	inan strongram piginatan neber	erron o des qui finali des mes ir cel 1800 trans i 2000	ا مەلىدىدىن	Roche Normal Carlo Green (1998)	dan in Amar Din	er Carlo et accept uladad f ettati	an man no managa ama a Manga If wi

BEFORE COPYING FORM, ENTER: SITE NAME ARS YIVED, FIX. P, 0.Bo X8, FOOT OF 13 45T., CARLSTADT N. J. 07477	1991 Hazardous Waste Repo
EPAID NO. WIJID 01414 61818 91315	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous Waste Report booklet before completing thi
Sec. A Waste cosciption RQ-WASTE FLAMMABLE LIQUID, P. LAB. PALK ON THE PLANMABLE LIQUID, P. LAB. PALK ON THE PARTY OF THE	01304065/11.0,5.
B. EPA hazardous waste code Mr. W. 10131 W. 10131 P. i. D. i	C. State hazardous wests code Page 15 LLES6 LS91
D. SIC code Page 16 E. Origin code Page 18 F. Source code Page 17 A H H	G. Point of measurement Page 17 B D D 1 1
J. Reported TRI constituent Page 18 K. CAS numbers Page 18 1. Myl 3. W/+ 4.	MH
On-site system type Quantity treated, disposed or recycled on site in 1991 OPsigo 19	C. UOM Density Page 19 D. Did this site do any of the following wester: treat on site, dispose on site on site, or discharge to a sever/PC Page 19 1 the /sai 2 = 2 = 2 No (SKRP TO SEC. II) N.SITE SYSTEM 2 Cuantity treated, Caposed or recycled on site in 189 age 19
Sec. A. Was any of this waste shipped off site in 1991?	M
III trainction Page 20 2 No (SKIP TO SEC. M) Site B. EPA ID No. of facility waste was shipped to Page 20 PALO 01815 61810 592 [MIO 41/1	D. Ciff-site availability code E. Total quantity shipped in 1991 Page 21 L. L. L. L. L. L. L. L. L. L. L. L. L.
Sito G. EPAID No. of facility westerwas shipped to Page 20 Page 20 Page 20 Pige 20 Pige 20	od to D. Off-eite cynilability code E. Total quantity shipped in 1891 Page 21 Page 21
	NTINUE TO EOX 6) S FCRU IS COMPLETE)
B. Activity C. Other effects D. Quentity recycled in 1801 due to now act Pegu 22 Fegu 22 Inge 23	tivilies E. Activity/production index F. 1961 Source reduction quantity Page 24
Yes	
Coniments:	. La Mai de de la coma de la composition della c

P000 /5_00

	STREET STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET,	NAME OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OF THE OWNER OWNER OWNER OF THE OWNER OWNE	NAME OF TAXABLE PARTY.		
BEFORE COPYING FORM, ENTER:					
SITE NAME HRSYNCO, INC.		•			
P.O. BOX, FOUTOF13 ST. CHRUTHOT, N.J. 67072		1991 Hazardou	s Waste Report		
EPAID NO. WIN 01414 6818 835	form GM	WASTE GENE MANAG	7.7		
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous \	Yaste Report booklet befor	e completing this fo		
Sec. A Waste description LAB-PHLK - RQ WASTE, PULSO, Instruction Page 15	N B, SOLID N	10.5.			
B. EPA hazardous waste code PIDIZIY MOGIN	C. State hezardo	ca waste code			
Page 15 [VID 1811] DIDIOITI DIDIOITI	re30 13	11C1210101 L	1 1631/131		
D. SIC code Page 18 Page 18 Page 18 Page 17 Page 17 Page 17 Page 17	G. Point of meas Page 17	Page 17	L RCRA-radicactive or Pege 17		
J. Reported TRI constituent K. CAS numbers Page 18 Page 18 1.	ا المسلّمة - السلّمة - المسلّمة -	2 MAI; 1:15.			
3. VIII - 1 - 4. K	<u> </u>	LI-LI E WWH			
Sec. A Quantity generated in 1990 B. Quantity generated in 1991 Page 18 O 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	C. UOM Density Page 19	waste: treat or on site, or cisc Page 19	any of the following to the side, disperse on side, recitage to a rewer/POTWI		
CN-S-TE SYSTEM 1	N-SITE SYSTEM 2	s/çel	(SKIP TO SEC. 11)		
Constle system type Quantity traited, disposed or recycled on site in 1991 Page 19 M M M M M M M M M M					
Sec. A Was any of this waste shipped off site in 1991? Instruction Page 20 Instruction Page 20	(X B)	n e e esta de la constitució de la companya de la constitució de	CONTROL OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF T		
Site B. EPA ID No. of facility waste was shipped to C. System type shipped 1 Page 20 Page 20	d to D. Off-sile availabili Page 21	ty code E. Total quantity shipp Page 21	ed in 1901		
PHD 61815 61910 5192 1111 04131	رك		116131.1		
Site B. EPA ID No. of facility waste was shipped to C. Systein type shipped 2 Page 20 Page 20	d to D. Off-site availabilit Page 21	ty code E. Total quantity shipp Page 21	ed in 1981		
WIA	ON THE PROPERTY OF THE PARTY OF				
	YTHUE TO BOX (I) FORM IS COMPLETE)				
B. Activity C. Other effects D. Quentity recycled in 1801 due to new active Page 22 Page 23		Esta index F. 1601 Source to	duction quantity		
	اللا ال		<u> </u>		
Comments: SEC. I - B - Doll, SEC. I - C - C/69	uskalaka a elektrisiken formulasiska asike uskan auskalak Uska minjalusi uskan formulasiskus asiken auskala	arian a superior de la companya de l	A CHARLIC COLLEGE SERVICE SERV		
· •					

BEFORE COPYING FORM, ENTER: SITE NAME ARSYNCO, INC				
P. O.BOX 8, FOOT OF 13 TST. CARLSTANT, ALI I	1991 Hazardous Waste Report			
EPAID NO. WIJIN 61818 81315	FORM WASTE GENERATION AND MANAGEMENT			
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous Waste Report booklet before completing this f			
Sec. A Waste description LAB-PHCC-RQ WASTE PULS Instruction Page 15	ONB-SOLID NOOFS-			
B. EPA hazardous weste code WASIZI W/18181	C. Stale hezardous waste code Page 15			
MAILI WALL	LICV 8181 LIG31717			
D. SIC code E. Origin code F. Source code Page 16 Page 18 Page 17	G. Point of measurement H. Form code L. BCRA-radioactive in Page 17 Page 17			
21813141 System type MWH1 1419141	ए छाठावार ड			
J. Reported TRI constituent Page 18 K. CAS numbers Page 18 1. W. J.				
3 WH 11 4	WW+1 1 - 1 5. WM 1 1 - 1 1 1 1 1 1 1 1			
Sec. A Quantity generated in 1990 Instruction Page 18 B. Quantity generated in 1991 Page 18 With the page 18 1 1 1 1 1 1 1 1 1	C. UOM Density Page 13 D. Old this site do any of the following to it waste: treat on site, dispose on site, real on site, dispose on site, real on site, or discharge to a sewer/POTW Page 19 1 Yes (CONTINUE TO SYSTEM			
☐ 1 lbs/jdsl ☐ 2 ag				
On-site system type On-sit				
Sec. A. Was any of this waste shipped off site in 1991? Yee (CONTINUE TO BO) 1 Yee (CONTINUE TO BO) 2 No (SKIP TO SEC. M)	ox ej			
Sit0 B. EPA ID No. of facility waste was shipped to C. System type shipped 1 Page 20 Page 20	D. Off-site availability code E. Total quantity shipped in 1991 Page 21			
PAD 0815 6810 518K IMIQUE 131	1/2 [1] [31/2]			
Site B. EPA ID No. of facility weste was shipped to C. System type shipped 2 Page 20	Page 21 E. Total swentity shipped in 1931 Page 21			
WA				
Sec. A Did new activities in 1991 result in minimization of this waste? If Yes (CONTINUE TO BOX E) If Yes (CONTINUE TO BOX E) If Yes (CONTINUE TO BOX E)				
B. Activity C. Char effects D. Cuentity recycled in 1801 due to new 1 Page 22 Page 23	limities E. Activity/production index F. 1891 Source reduction quantity Page 23 Fage 24			
W				
Comments:	。 1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,1995年,19			

	- #
BEFORE COPYING FORM, ENTER:	
SITE NAME ARSYNCO, INC	
P. D. BOX 8, FOUT OF 13 \$ ST., CARLSTANT, M.J. 07072	1991 Hazardous Waste Repor
EPAID NO. WIJID 1944 688 9315	FORM WASTE GENERATION AND MANAGEMENT
. On which the control of the contro	WANAGENENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 o	of the 1991 Hazardous Waste Report booklet before completing this
Sec. A Waste description EAB-PACK_RQWASTE ALKALIAN Instruction Page 15	IE LIQUID, N.O.S.
B. EPA hazardous waste code	C. Stale hazardous waste code Page 15
MAII WHII WALL	
D. SIC code Page 18 E. Origin code [/] Page 17 F. Source code Page 17 [Z S S System type M M 1	G. Point of measurement H. Form code Page 17 Page 17 Page 17
I Supplied to the supplied to	
Page 18 1. 1/1/41 3. 1/1/41 4.	
Sec. A Quantity generated in 1990 B. Quantity generated in 1991 Page 18	C. UOM Density Page 19 D. Did this site do any of the following to wester: treat on site, dispose on site, n on site, or discharge to a sewer/POTM Page 19 1 bs/gai 2 ag 2 No (SMP TO SEC. II)
	ON-SITE SYSTEM 2
	On-site system type Cuentity treated, disposed or recycled on site in 1991 Page 19
Sec. A Was any of this waste shipped off site in 19917 X1 Yes (CONTINUE TO 6)	
Sec. A Was any of this waste shipped off site in 1991? Instruction Page 20)
Site B. EPAID No. of facility waste was shipped to C. System type shipped to Page 20 Page 20	ped to D. Off-site availability code E. Total quantity shipped in 1991 Page 21
PMD 61815 61810 51812 111/121/1	ا لا ليييين
Site B. EPA ID No. of facility waste visu shipped to Page 20 Fage 20	pod to D. Off-site availability code E. Total quantity shipped in 1991 Page 21
WALLILLILLILLILLI	
The state of the s	CONTINUE TO BOX B)
B. Astivity C. Other effects D. Quantity recycled in 1991 due to now ex Pege 22 Pege 23	E. Activity/production index F. 1991 Source reduction quantity Page 23 Fage 24
Comments:	North de eathr de mar de litheach agus it anns a lean agus in agus in it in an ann an agus agus in agu
мен причинальный применти в приметов на приметов на приметов приметов приметов приметов приметов приметов под Приметов на приметов приметов приметов подражения приметов приметов приметов приметов приметов подражения подра	
	Page If of

THE RESERVE OF THE PARTY OF THE	
BEFORE COPYING FORM, ENTER:	
SITE NAME ANSYNCO, FNC.	
P. U. BOX8, FOOT OF/3 ST., CARLSTAN, N.S. 07072	1991 Hazardous Waste Report
EPAID NO. WIJID 01414 61818 7315	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous Waste Report booklet before completing this fo
Sec. A Waste description LAB-PACK RQ WASTE CORROS. Instruction Pede 13 LAB-PACK	TIME SOLID, N.O.S.
B. EPA hazardoùs wasto code 11005 10006 Page 15 010107 10008 10008	C. State hazardous waste code Page 15 LLCI/12191 LLCI/1571
D. SIC code E. Origin code L. F. Source code	G. Point of measurement H. Form code I. RCRA-radioactive mic
Page 16 Page 16 Page 17 ≥ 1815 151 System type MMM 1	Page 17 Page 17 Page 17
J. Reported TRI constituent K. CAS numbers (1.0)	
4.4	121 - 1-16-16-16-16-16-16-16-16-16-16-16-16-16
Cn-site system type Quantity treated, disposed or recycled on site in 1991 Or	C. UCM Density Page 18 D. Did this site do any of the following to this waste: treat on site, dispose on site, recycled on site, or discharge to a severi/PCTV/? Page 19 1 Yes (CONTINUE TO SYSTEM STIFE SYSTEM 2 site system type Cuantity treated, disposed or recycled on site in 1991 In the site do any of the following to this waste: treat on site, disposed on site in 1991 Countity treated, disposed or recycled on site in 1991 In the site do any of the following to this waste: treat on site, dispose on site, dispose on site, dispose on site, dispose on site, dispose on site, dispose on site, dispose on site, dispose on site, recycled on site in 1991
Sec. A. Was any of this waste shipped off she in 1991? Yes (CONTINUE TO 80) 2 No (SKIP TO SEC. M)	× E)
Site 8. EPA ID No. of facility waste was shipped to C. System type shipped 1 Page 20 Page 20	d to D. Off-site availability code E. Total quantity shipped in 1991 Fage 21
PAD 085 680 5192 W/1313	<u> </u>
Site B. EFA ID No. of facility waste was shipped to C. System type shipped 2 Page 20 Fage 20	d to 0. CYT-site availability code E. Total quantity shipped in 1991 Page 21 Fage 21
W ₁ A ₁ L ₁ L ₁ L ₁ L ₁ L ₁ L ₁ L ₁ L	
)	ALIMITE TO BOX B)
B. Asthmy C. Char official D. Oventity recycled in 1991 due to new active Page 22 Page 23	Miles E. Astivity/production index F. 1981 Source reduction quartery Fage 23 Fage 24
Comments: 3FC-I-C-C184, C306, C313	ikkent, nachalikan arawasi wat e i i siratusa untanggiranda in maka sapun na siratusa da siratusa da magazina n Tanggiran

Pago 19 of <u>entractival and a contractival and a co</u>

BEFORE COPYING FORM, ENTER:	
SITE NAME ARSYNCO, INC	
P.O. BOX8, FOOT OF-13-55; CARLSTANT N.J. 09072	1991 Hazardous Waste Report
•	Çmakrino savenstridir mistrimistori e
EPA 10 NO. MIJID 121414 61818 91315	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous Waste Report booklet before completing this for
Sec. A Waste description LAB-PISCK - WA-STE CURRUSIVE Instruction Page 15	Liquio, Mois
B. EPA hazardous waste code DIOIDK (1/1013) Page 15 PIOKIST WILL (MALL)	C. State hezardous weste code Page 15
D. SIC code Page 18 E. Origin code [] Page 19 F. Source code Page 17 [] [] [] [] [] [] [] [] [] [G. Point of measurement H. Form code Page 17 L RCRA-radioactive min Page 17 L B 0 0 5
	- 2
Sec. A. Cuantity generated in 1990	C. UOM Density Fage 18 D. Did this site do any of the following to this waste: treat on site, dispose on site, necy on site, or discharge to a sewer/PCTX? Page 18 1 the 'gai 2 ag 2 sg C. UOM Density D. Did this site do any of the following to this waste: treat on site, dispose on site, necy on site, or discharge to a sewer/PCTX? Page 18 1 Yes (CONTINUE TO SYSTEM STEED)
On-site system type Quantity treated, disposed or recycled on site in 1891 C	CHARTE SYSTEM 2 The life system type
Sec. A War any of this waste shipped off site in 1991? Yes (CONTINUE TO BO Instruction Page 20 2 No (SKIP TO SEC. M)	OX 5)
Site 9. EPA ID No. of facility waists was shipped to Page 20	Page 21 Page 21
CHOPER RED RES MICHILI	1/1 11111111111111111111111111111111111
Sits 8. EPA ID No. of facility waste rate shipped to Page 20 Page 20	ed to D. Cri-site availability code E. Total quantity shipped in 1991 Page 21
A CONTROL OF THE PARTY OF THE P	
IV Instruction Page 22 No (774)	INTINUE TO BOX 6) S FORM IS COMPLETE)
B. Activity C. Other offects : U. Quantity recycled in 1991 due to new 62 Page 22 Page 22 Page 23	tivities E. Activity/production index F. 1901 Source reduction quantity Page 23 Page 24
Comments:	

Page 20 of 2

BEFORE COPYING FORM, ENTER:			
SITE NAME ARSYNCO, INC			•
P. O. BOX8, FOOT OF 13 To ST. CARLSTANT, N. J.			1991 Hazardous Waste Report
EPAID NO. MIDIO OTATA REPEBBISING		FORM GM	WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 or	f the 199	1 Hazardous Waste R	eport booklet before completing this f
Sec. A Waste description LAB-PAUK - RQ WASTE 6X1D	IZEI	r Neocs.	
B. EPA hazardous waste code WIGOI WIDIOIS		C. State hazardous waste o	æde
WALL WALL		•	-1/814 VXX
D. SIC code Page 18 E. Origin code [] F. Source code Page 17 A 1914		G. Point of measurement Page 17	H. Form code Page 17 B O O C B O O B O O C B O O C B O O C B O O B O O C B O O C B O O C B O O B O O C B O O C B O O C B O O B O B O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O B O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O O B O B O O B O O B O O B O O B O O
		الألماء الذياء و المالماء المالياء ا	MAIII-II-II-
Sec. A. Cuantity generated in 1990	L		D. Did this site do any of the following to the waste: treat on site, dispose on site, red on site, or discharge to a sever/FOTW/Page 19 1 Yes (CONTINUE TO SYSTEM 2 99 2 No (SKIP TO SEC. II)
On-site system type Quantity treated, disposed or recycled on site in 1891	ON-SITE SYN On-site syste Page 19	التباق على التباق	city treated, disposed or recycled on site in 1991
Sec. A. Was any of this waste shipped off site in 1991? Yes (CONTINUE TO BE IN 1991) Yes	OX B)		times from a character and a construction of a construction of the character and a construction of the con
Site B. EPA ID No. of facility waste was shipped to C. System type shipped to Page 20	ed to D.	. Off-site availability code Page 21	E. Total quantity shipped in 1591 Page 21
PWD 01815 61810 51812 1MB14131		<u>L</u>	<u>। । । । । । । । । । । । । । । । । । । </u>
Sito E. EPA ID No. of facility waste was shipped to C. System type shipp Page 20 Fuge 20	ed to D.	. Off-site availability code Page 21	E. Total quantity shipped in 1901 Page 21
MIAILLI IMILLI	AN STREET, SELVING		<u> </u>
Sec. A Cid now activities in 1991 result in minimization of this versite? 1 Yes CC V Instruction Page 22			
B. Activity C. Other effects D. Quantity recycled in 1991 due to new ac Pege 22 Page 23	divities	E. Activity/production inche Page 23	F. 1891 Source reduction quantity Page 24
W	انا		
Comments:		PAK SINGKA BAKÉTANEN ASIKA BERASIKA JAKESEN	ant, vidion like, at million am vidion and eigen ann ainm an thair an ainm ainm ainm ainm ainm ainm ainm a
· · · · · · · · · · · · · · · · · · ·			PERSON THE SECURISH CONTRACT OF THE PROPERTY OF THE PROPERTY OF THE PERSON OF THE PERS

BEFOPE COPYING FORM, ENTER:				•
SITE NAME ARSYNCO, FINCO				•
P.O.BOX8, FOOT DF 13 THST, CARLSTANTINTO			1991 Hazardou	s Waste Report
EPAIDNO. WIJW 01414 6 1818 181315		FORM GM	WASTE GENE	
INSTRUCTIONS: Read the detailed instructions beginning on page 13 o	of the 199	91 Hazardous Waste P	eport booklet befor	e ∞mpieting this for
Sec. A Waste description LAB-PHICK-RQ WASTE CORRU	osi vE	Lano, Nece	5-	
8. EPA hazardous waste code		C. State hazardous weste of Fage 15		14111
D. SIC code E. Origin code L. F. Source code		G. Point of measurement	H. Form code	L. RCRA-radioactive mix
Page 15		Fage 17	Page 17	Page 17
J. Reported Tri constituent Page 18 K. CAS numbers Page 18 1. W.4-1		- - 2	WWI III-	
	WVI		1 5 1/1/1	
Sec. A Cuantity generated in 1890 Il Instruction Page 18 B. Quantity generated in 1991 Pege 18	•	ge 19	waste: treat on on site, or disci Fage 19	any of the following to this sits, dispose on site, recyc harge to a sewor/POTW? (CONTINUE TO SYSTEM I SXIP TO SEC. III)
On-site system type Quantity treated, disposed or recycled on site in 1681	ON-SITE ST On-site syst Page 18	lem type Quant	ity tracled, disposed or re	
Sec. A. Was any of this waste shipped off site in 1991? Yes CONTINUE TO B Instruction Page 20	•	Andread (Thirtman an Antonia) and an an		
Site E EPA ID No. of facility waste was shipped to C. System type shipp Page 20	ced to [Ciff-site availability cope Page 21	E. Total quantity shippe Page 21	ed in 1981
640 6812 R1818 128 1111 11111		لا	ليليليا	11141.6
Site B. EFA ID No. of facility waste was chipped to C. System type shipp 2 Fage 20 Fage 20	ced to C	D. Off-site availability code. Fage 21	E. Total quentity shippe Page 21	ed in 1291
1.22	ONTINUE TO S FORM IS	O BOX SI COMPLETS)		
B. Activity C. Other effects D. Quantity recycled in 1991 due to new act Page 22 Page 23		ethilies E. Activity/production and sx F. 1691 Source Page 23 Page 24		duction quantity
] • [] 			NORMAL DESCRIPTION OF THE PARTY
Comments:	idelia felkimyssett (delikaria (1874) in 1864 in 1864 in 1864 in 1864 in 1864 in 1864 in 1864 in 1864 in 1864 in 1864 in 1864 in 18	nalistado de filológico de Comprese	Control of the State of the Sta
The second secon	приявальной передара	andreader for the second section of the section of the s		3
en en en en en en en en en en en en en e	ne transfer	neanaire à direction de la comme		

BEFORE COPYING FORM, ENTER:							
SITE NAME ARSYNCO, INC.							
P.O.BOX8, FOOT OF 13 ST. CARLSTANT, N.J.	1991 Hazardous Waste Report						
EPAID NO. WILD OUR GES 91315	FORM WASTE GENERATION AND MANAGEMENT						
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this fo						
Sec. A Waste description Instruction Page 15 LAB-PACK - RO WASTE POISON.	B SOLID, NO.S.						
B. EPA hazardous waste code (U/1917) (U/1818)	C. Stale hezardous waste code Page 15						
MIRE MAIN MAHIN	LICI312181 LICI31717						
D. SiC code E. Origin code F. Source code Page 16 Page 17	G. Point of measurement H. Form code I. RCRA-radiosothre n Page 17 Page 17						
121813141 System type MIMH 1 1AG 141	ए। हिल्लिए। डि						
	111-11-1 2 WW 111-11-11-11-11-11-11-11-11-11-11-11-11						
SCC. A Quantity generated in 1990 B. Quantity generated in 1991 Page 18	C. UOM Censity Fage 19 D. Old this site do any of the following to the waste: treat on site, dispose on site, reconsists, or discharge to a sewer/POTW Page 19 1 Yes (CONTINUE TO SYSTEM) 1 Yes (CONTINUE TO SYSTEM)						
Cn-site system type Quantity treated, disposed or recycled on site in 1991 C	CN-SITE SYSTEM 2 On-site system type Ouanity treated, disposed or recycled on site in 1991 Page 19						
Sec. A Was any of this waste shipped off site in 1991? III Instruction Page 20	· · · · · · · · · · · · · · · · · · ·						
Site B. EPA ID No. of facility waste was shipped to C. System type shipped to Fage 20 Page 20	ped to D. Off-site availability code E. Total quantity shipped in 1991 Page 21						
PHID 0 8 15 6 8 10 5 19 R 1 1 10 14 131	1 2 111129.						
Site B. EPA ID No. of facility weste was shipped to C. System type shipped 2 Page 20 Page 20	ped to D. Off-site availability code Fage 21 E. Total quantity shipped in 1991 Page 21						
WA MLL							
	ONTINUE TO BOX B) . IS FORM IS COMPLETE)						
B. Activity C. Other effects D. Queritary recycled in 1991 due to new as Prope 22 Page 22 Page 23	E. Activity/production index F. 1201 Source reduction quantity Page 23 Page 24						
W							
Comments:	er der eine Bereichen der der eine Bereich bereichte der der der der der der der der der de						
	Page <u>23.</u> of						
Experiment transfer (section of the forest continues of the continues of t	and the control of th						

BEFORE COPYING FORM, ENTER:		
SITE NAME ARSYNCO, INC.	1991 Hazardous Waste Repo	rt
P.O.BOX 8, FOOTOF13 \$5, CARLSTANTN. J. UT OTZ	1991 Nazardous Wasie nepol	"
EPA 10 NO. WITH 01414 61818 81315	FORM WASTE GENERATION AND MANAGEMENT)
AND AND THE PROPERTY OF THE PR	I Singulari Print	-
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	of the 1991 Hazardous Waste Report booklet before completing this	i fo
Sec. A Waste description LAB — PACK - RQ WASTE POIS Instruction Page 15	SONB LIQUID, NO.S.	NUETRA
B. EPA hazardous waste code [U]/1619] [U]/1818] Page 15	C. State hezerdoùs waste code Page 15	
WI/BISI WOILE MAIL	11/KIQ 11/C131814	2
D. SIC code Page 18 E. Origin code	G. Point of measurement H. Form code Page 17 L. RCFA-radicactive Page 17 Page 17	e mi
	111-111-11 2 MAIII-11-11-11-11-11-11-11-11-11-11-11-11-	J-L
Sec. A. Quantity generated in 1990 Instruction Page 18 B. Quantity generated in 1991 Page 18	C. UOM Density Page 19 D. Did this site do any of the following to waste: treat on site, dispose on site, on site, or discharge to a sewer/POT Page 19 1 Yes (CONTINUE TO SYSTI	recy TW7
On-site system type Quantity treated, disposed or recycled on site in 1991	CN-SITE SYSTEM 2 On-side system type Cuantity treated, disposed or recycled on site in 1991 Page 19 MI	_
Sec. A. Was any of this waste shipped off site in 1931? Instruction Page 20 1 Yes (CONTINUE TO BO	·	نمحن <u>ن</u> م
Site B. EPA ID No. of facility waste was chipped to C. System type shipped 1 Page 20 Page 29	D. Off-site availability code Page 21 E. Total quantity shipped in 1931 Page 21	
PAD 085 GRD SIEK IMOKILI	ا لا لـــــــــــــــــــــــــــــــــ	کا٠
Site 8. EPA IO No. of facility waste was shipped to C. System type shipps 2 Fage 20 Page 20	pod to D. Off-site evaluability code Page 21 E. Total quantity shipped in 1831 Page 21	
		- [
1 . 1	CATINUE TO BOX 6) IS FORM IS COMPLETE)	
B. Activity C. Other effects D. Quantity recycled in 1991 due to now ac Page 22 Page 23	E. Activity production undex F. 1991 Source reduction quantity Page 23 Page 24	
W].[
Comments: $SECT-C-C377$	OS LAMED MODEL COMMUNICACIÓN STORA PROGRAMA PROGRAMA PARAMA PORTA A BLANDARDARA (Súr MATERIA ARTERIA A MATERIA DE E	فهند

BEFORE COPYING FORM, ENTER:			
SITE NAME ARSYNCO, IN	1		
P.O. Box 8, Foot of 13 \$51, C	LARLSTANTNI J. UTOTE		1991 Hazardous Waste Report
EPAID NO. WIJID 01414 &	१८१८ हि। इन्ह	form GM	WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Road the dotailed ins	structions beginning on page 13 of the 1	S91 Hazardous Waste Re	eport booklet before completing this fo
Sec. A Waste description LAB-PACK-	RQ WASTE CORROSI	VE SOLID, NIO.	
B. EPA hazardous waste code DIOIOI2	101010131	C. State hazardous waste co	ode
3 · ·	WHII WALL	MA	
D. STC code E. Origin code	F. Source code Page 17 IA 9-14	G. Point of measurement Page 17	H. Form code Page 17 B O O /
J. Feported TR constituent Page 18 K. CAS numbers Page 18	1. WKI I I		WALLI-LI-LI
EJ 2 N/H	LILI-LI 4 WW	· · · · · · · · · · · · · · · · · · ·] 5. K M&[[
	Page 18	UCM Censity Page 19 1 151/gol 12	
Page 19	posed or recycled on site in 1891 On-site s Page 19	,	ty treated, disposed or recycled on site in 1981
Sec. A. Was any of this wasto shipped off site in 1591?	Yes (CONTINUE TO BOX B) 2 No (SXP TO SEC. M)	CONSTRUCTOR CONTRACTOR SECTION AND ADMINISTRATIVE SECTION OF THE S	ACTION CALL - COMPONING A SAME BETT AND AND AND AND AND AND AND AND AND AND
Site B. EFA ID No. of facility waste was shipped to Page 20	C. System type shipped to Page 20	D. Off-site evaluability roda Page 21	E. Total quantity stripped in 1931 Page 21
	81815 IMIO14181	لا	<u> </u>
Site B. EPA ID No. of facility waste was shipped to Page 20	C. System type shipped to Page 20	D. Off-site availability code Page 21	E. Totel quantity shipped in 1991 Page 21
MA TO THE PROPERTY OF THE PROP	Marie de la companya del companya de la companya de la companya del companya de la companya del la companya del la companya de la companya de la companya de la companya de la companya del la companya d		COMMINISTRATION OF THE ASSESSMENT OF THE ASSESSM
Sec. A. Did nevracibilies in 1991 (equit in minimization of V Instruction Pege 22	of this viasto?	•	
B. Activity C. Other effects Page 22 Page 22	D. Quantity recycled in 1891 due to new activities Pigge 23	E. Activity/production index Fuge 23	F. 1931 Source reduction cuantay
	AND THE PROPERTY OF THE PROPER		
Comments:	ere e e sur l'annable que en l'annable de moi	Balantin - Papide - Lucipe (C.C. Chi. edited in Little Code (A)	in the first state of the first state of the
ė.	en fer anten annetistische Present annet der Vertreiche Vertreiche des Seites für der der Seites der Vertreich	r anna an sainm an bheadh bhailt an an sainmeach aig	
entertentum stertiin viintoo suo quantiittiin seenassa joo see tas	gygyndygan acce gwiringa Gydd Cy <mark>llif fan Rif Gall f</mark> an Callinga yn ond	era o e monte tenena e e e como nome n	Page <u>25</u> of an area of the control

	APPLICATION OF THE PROPERTY OF		CONTRACTOR OF THE PROPERTY OF
BEFORE COPYING FORM.			
SITE NAME ARSYNCO, INC.	<u> </u>		
P.O. BOXE, FOUT OF 13 TST., CANSTUNT.	N.J.		1991 Hazardous Waste Repor
EPAID NO. WITID 101414 61818 4315		form GW	WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on p	page 13 of the 199	11 Hazardous Wast	e Report booklet before completing this
Sec. A Weste description LAB - PACK - RQ WASTE W	WATER REAC	TIVE SULID	N. O.S.
B. EPA hazardoue waste code DIODI/ DIOIOI3		C. State hazardous was Page 15	ste code
D. SIC code E. Origin code L. F. Source code Page 16 Page 17	Í Ka	G. Point of measureme Page 17	H. Form code Page 17 L PCRA-radioactive Page 17 Fage 17
J. Reported TRI constituent Page 18 K. CAS numbers Page 12 1.	NRITI	· _ - - - - - - - - - - - - - - - - - -	2 WW 11 - 11 - 11 - 11 - 11 - 11 - 11 -
Sec. A. Cuantity generated in 1990 II Instruction Page 18 B. Quantity generated in 1991 Page 18	C. UOI Pag	ge 19	
On-SITE SYSTEM 1 On-site system type Quantity treated, disposed or recycled on site in 199 Page 13 LM	Page 18	PALAN NO PROPERTY AND A STATE OF THE PARTY AND	uchtity treated, disposed or recycled on site in 1991
Sec. A. Was any of this waste subped off site in 1691? Yes (DON) Instruction Page 20 2 No (SKP)	TINUE TO BOX E) TO SEC. M)	ingendiana (commencent to 4. Aquas person).	
1 Page 20 Fage :	20). Off-site availability coo Page 21	Page 21
). Off-site availability coo	L
N_1A_1 M_1			
Sec. A Cid new activities in 1891 result in minimization of this vasto?	1 Yes (COMMUE TO 2 No MISS FORVAIS		n paragrama di Promitina di Romanda di Ambaranda di Ambar
B. Activity C. Other effects D. Quantity recycled in 1801 of Fage 22 Page 22 Fage 23	us la new activities	E. Activity/production Page 23	index F. 1991 Source reduction quantity Fig. 24
Yes	البا،لبل		
Comments:			ent ausen ausete eine eine eine eine Europe der eine Ausentliche der eine Europe der Erstelle der Fauste der d Die der der der der der der der der der de

Andrews College Street College Street	GGS-FASTA CITAL COMPANION STOPPING STOPPING	ARTICLE AND DESCRIPTION						
BEFORE COPYII	NG FORM,							
SITE NAME	ARSYNCO,7	NC.						•
Pools	30x8, FOUT 0F/3	ST. CARLSTAN	T. N. J.		•	199	1 Hazardous	Waste Report
			. — 1	-	FORM			
EPA ID NO.	NIJID 01414	1688181	12		GM	W.	ASTE CENE	RATION AND
					LIVIE		MANAGI	EMENT
INSTRUCTIO	NS: Poud the detaile	d Instructions begin	ning on page 13 of	the 159	91 Hazardous Waste R	apor	t booklet before	completing this to
SGC. A. Waste des	cription / A.D. Du /	O- ROWAS	TE CURROSIS	16 L	LIQUID, N.O.S	18070- 18070-	ADDARNE DALEMARDINE	
l Instruction	1 Page 15 4779 777-01							
B. EPA hezerdous weste Page 15	1012131	DIOIOIZI			C. State hazardous waste o	ebox		
·	121010131	WALL	iMall		لـــــــــــــــــــــــــــــــــــــ	<u>S1/</u>	1410 W	14111
D. SiC code Page 18	E. Origin code //	F. Source co-	de		G. Point of measurement Page 17	1	Form code Page 17	L RCRA-regioactive mi
ાટ્રાષ્ટ્રાટ્રાઇ	System type M	. 1	1A19141		Ĺ	l	B10101/1	اکا
J. Reported TRI constitu Page 18	vent K. CAS num	abors •	1 1/4/11			1/KI	A-I I I I-I	1 1.1 1
	<u> </u>	/ <u>/</u>		·			5. WIAI	
Sac. A. Quantity of Instruction	enerated in 1960 n Page 18	B. Quantity generated in Page 18	n 1591	C. ÜC	Old Density 1go 19	MINN		any of the following to the
W 14 1 1 1 1		11111	1/1/1.0	14	ט אאט. ט	,	Page 19	auge to a sewer/POTW?
·····				ų.	1 lbs/gal [CONTINUE TO SYSTEM SKIP TO SEC. EN
ON-SITE SYSTEM 1	Quantity treate	d, disposed or recycled o		N-SITE S	YSTEM 2.	ily tre	aled, disposed or red	cycled on site in 1561
Page 19			Pa	ge 19	<u> </u>	-		المال الماليا
		en en en en en en en en en en en en en e						
	of this waste shipped off site in 19 in Page 20		Yes (CONTINUE TO BOX No (SKIP TO SEC. M)	X 8)				
Site B. EPAID N	io, of facility waste was shipped to	•	C. System type shipped Page 20	d to C	D. Off-site availability code Page 21		Total quantity shippe Page 21	d in 1991
PH	40 6815 651	0 592	14141 LI		Ĺ			1.141/1.
Sito B. EPA ID N 2 Page 20	vo. of facility wests tras chipped t	•	C. System type shipped Page 20	d to I	D. Cif-site availability code Page 21		Total quantity shippe Page 21	d in 1691
NIA	. 11 11		IMI I I		لــا		الللل	
	ctivities in 1931 result in minimiza	ation of this waste?	t Yes (COA	MNUET	O BOX 6)			PART CONTRACTOR APPROPRIES
IV Instruction B. Activity	n Page 22 C. Other effects	D. Quantity recycle	2 No MAIS		E. Activity/production inde	. K	Fr. 1501 Source rec	dúction quarity
Page 22	Page 72	Page 23			Page 23		Page 24	
		السلسليل	• احاططنادات	لــا	الالالالا		 _ _ _ 	
SE PROCESO E PER ASSES MANAGEMENTO PLANES.	هد وموهوم المواجه و المواجه و المواجه المواجه المواجه المواجه المواجه المواجهة المواجهة المواجهة المواجهة الم المها والمواجهة المواجهة الم	odu pau ilu od rokomotomotomieki ka 4 do Odustali ilusera suuteesia kiiluteesia kanki	ones i della etteriore etterore en der er er er er kanne er er er er	handrigge at the formation supplies only at the new attraction of the his in its interestation	المرومين و المرومين و	AN AND PROPERTY OF THE PROPERT	Militari ar iz goldon da filozofia neglesia ez. Militari da izan en anti da izan en el izan el	
Comments:			er de la company des la company des la company de la compa	Mark Million	Deem of the second second second second second second second second second second second second second second			
and the second of the second o	e productych († 1888), og truste fakt bekar og skalationske och et sammet blev 1990.	The state of the s		a rei \$ \$ \$ \$ \$ \$ \$			C. S. C.	'age 37_ of_

THE STATE OF THE S

1.1622

BEFORE COPYING FORM. ENTER:	
SITE NAME HRSYNCO, INC.	
P.O. BOX & FOOT OF 13-35T, CARLSTADT, N.J. 07072	1991 Hazardous Waste Report
EPAID NO. WIJIN DIXIX 61818 1315	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1931 Hazardous Waste Report booklet before completing this fo
Sec. A Waste description LBB-PACK- RQ WASTE ACID 44	DUFD, N.O.S.
B. EPA hazardous waste code DIDIDIZ WWI	C. State hazardous waste code Page 15 W.U.
D. SIC code Page 18 E. Origin code F. Source code Page 17 RISE System type M M M M M M M M M	G. Point of measurement H. Form code Page 17 L RCRA-radioactive m Fage 17
J. Peported TRI constituent Page 18 CAS numbers Page 18 1. L76 2. AVIAL L-L1-L4. X	16141.931.181 2 WHIII.II.
Sec. A. Quantity generated in 1990 Instruction Page 18 B. Quantity generated in 1991 Page 18	C. UCM Density D. Did this site do any of the following to the waste: treat on site, dispose on site, recon site, or discharge to a sewer/FC'W? Page 18 1 Yes (CONTINUE TO SYSTEM) 1 Design 2 No (SKCP TO SEC. 21)
On-site system type Quantity treated, disposed or recycled on site in 1991 Or	N-SITE SYSTEM 2
Sec. A. Was any of this waste shipped off site in 1991? III Instruction Page 20 I Yes (CONTINUE TO BO 2 No (SKIP TO SEC. IV)	X 6)
Site 3. EPA ID No. of facility waste was shipped to Page 20 PAD 0 1815 6 F16 5 F2 M10 7 19	d to D. Off-site availability code Page 21 E. Total quantity shipped in 1991 Page 21
Site B. EPAID No. of facility waste was shipped to Page 20 N.A	D. Off-site evaluability code E. Total quantity shipped in 1991 Fage 21
3	MINUE TO BOX B) FORM IS CONFLETE)
B. Aclimity C. Other effects D. Quentity recycled in 1801 due to nevr active Page 22 Page 23	vilias E. Activity/production indox F. 1661 Source reduction quantity Page 23 Fage 24
Comments:	

	TOTAL STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET,		THE PERSON NAMED IN THE PERSON NAMED IN	ZAVIA P	SELECTED AND SELECTED	MIDITE!	SAME TO KE STEEL	
BEFORE COPYING	G FORM,							
SITE NAME	HRSYNCO, INC.	÷	·					
P. O. B	0x8, FOOT OF 13#57.		LT. 07072			19	91 Hazardous	s Waste Report
			1		FORM			
EPA ID NO.	MIN OITH	1818 1213	121		GM	W		RATION AND
					CAHAH		MANAG	EMENT
INSTRUCTION	IS: Read the detailed In	structions begin	ning on page 13 of 1	the 15	91 Hazardous Wa	ste Repo	rt booklet before	completing this for
PARTITUDE OF THE PARTIT		Λ C 144A	it cur		70 C.1 27c		nd a 1900-19, dags manner greicht is ei Armie Field, gegen die Stieren is Eit	ing spaniel varancjekom. Pastaniini
Sec. A. Waste descri		- KU WA	SIE CHROMI		- 70-011	ON		
B. EPA hazardous waste o	20de 1/21010K1	V101017	$\overline{\lambda}$		C. State hezardous	vasta code		
Page 15		R/ATT			Page 15	ı Cı/	. 1817) K	
D. SiC code	E. Origin code 📙	F. Source cod			G. Point of measure		Form code	L RCRA-radicactive mix
Page 18 121813141	Page 18 System type IM IV KL	Page 17	14 19141		Page 17	i	Page 17 [B 0 0 /]	Page 17
J. Reported TRI constitue								<u> </u>
Page 18	Page 18 J a. W. K.	1 1 1 1 1 1 1	ı. <u>₩₩.</u> 4. ₩	V K4 1	┛╸┖┈┸┈┛╸┖┈┚ ┈┸┈┸┈┨╺╏┈┸	2. L∑ .]-∐.	5 1 <u>0</u> /1/1	└─┴─┤╸┖─┤ └─┴─┤╸└─┴─┤╸└
Sec. A Guentity cer	nersted in 1890 B. (C. UC			D. Pid this also do	
II instruction I		Quantity generated in Page 18	1 1201		DM Density iga 18		weste: treat on on site, or disch	any of the following to this site, dispose on site, recyc rarge to a sewer/POTW?
MMIII			ساک اف	12		u	. =	(CONTINUE TO SYSTEM 1 SKIP TO SEC. III)
ON-SITE SYSTEM 1			<u>c</u> s	Y-SITE S	YSTEM 2	9 \\\ 5 24	DAS 40 I	54F 10 SEC. 0)
On-site system type Page 18	Quantity treated, dis	posed or recycled or		go 19	•	Cuantity tre	aled, disposed or rec	cycled on site in 1931
M						اسسا معمد معمد		
Sec. A. Was any of a	this waste shipped off site in 1891? Page 20	⊠1 □ 2	Yes (CONTINUE TO BOX No (SKIP TO SEC. M)	X (3)				
Site 8. EPAID No.	, of facility waste was shipped to		C. System type shipped Page 20	i to	D. Off-site availability of Page 21	930 E.	Total quantity shippe Page 21	d in 1581
PA	p 085 6910	5.5K	MO1411		_			11121.10
Site 5. EPA ID No. 2 Page 20	of facility waste was shipped to		C. System type shipped Page 20	i to	D. Off-site availability of Page 21	cose E.	Total quantity shippe Page 21	d in 1991
MIA			MLLL					
Sec. A Did new act N Instruction	inties in 1861 result in minimization (Pope 22		1 Yes (CON			Prince Prince	de The Control of the	Transmitter and an area of the section of the sec
G. Actably Page 22	C. Other offects Page 52	D. Cuentily recycle	d in 1831 due la new actin	-	E. Activity/production	n index	F. 1991 Source red Page 24	Sudion Quantity
				L				
DELL WILL	2 No		Pitzatini sakunggan dalam dara				LEGA ANTINETHON BUT IN THE	to constant Atlanta santa principal and the
Comments:	an alfring, men et a stagstadd verdier en austragen er en sterkaan de sja der velgenger in	ut planen en automorale distribu	<u>garan (taraban da da rara) kang sakata Sakata (tara) kang sakata</u>	الا بنيار اسلامي	HINNE REZSÉAGE, GJUNGARATA "ESST	Teachine (I. 30 J Teac)	والمناطقة المناطقة ا	t ind de revidue (fax det 200 generalish e egetless.
E carretropada de deservolación de la constitución	gerre har het, deuts der zoeitst jog voors etten journalistisment automo-	er ya gada (<u>18. najiringa</u> a kin girapili (18. najirina 18. najirina 1	engentra programming page las sassatas et	and and the	cura della dell'arrica di Service. S	Lando de combigo diace		
n. 115. millioner de Tilon Makhabas	nervanista (Chestralining enrese rigi	TO SECULO DE LA COMPANSA DE LA COMPANSA DE LA COMPANSA DE LA COMPANSA DE LA COMPANSA DE LA COMPANSA DE LA COMP	Constitution and the constitution of the const	skeetter v	roman deliver deliver element	a Mari		100 29 of

	AN ALL MANUEL AND ALL MANUEL AND ALL COLUMN AND ALL COLUMN AND AND ALL COLUMN AND
BÉFÖRÉ COPYING FORM, ENTER:	
SITE NAME ANSYNCO, FNCI	
P.O.BOX 8, FOUT OF 13 FST, CARLSTANT, NJ, 07072	1991 Hazardous Waste Report
EPAID NO. WIJID 0144 688 835	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous Waste Report booklet before completing this to
Sec. A Waste description LAB - PACK. RO WASTE UXIDIZER,	CORROSITE LIQUID, NIDIS.
B. EPA hazardous waste code	C. State hazardous waste code Page 15
D. SIC code Page 16 E. Origin code [/] Page 17 R 1813 [/] System type [M	G. Point of measurement H. Form code Page 17 L. RCRA-radioactive min Page 17
J. Reported TFI constituent Page 18 K. CAS numbers Page 19 1. WW.	
Sec. A. Ouznitty generated in 1990 Il Instruction Page 18 WIALL I I I I I I I I I I I I I I I I I I	C. UOM Censity Page 15 D. Cid this site do any of the following to this waste: treat on site, dispote on site, teg on site, or discharge to a sever/PCTW? Page 19 1 that/gal 2 sq 2 No (SICP TO SEC. 49)
On-site system type Quantity treated, disposed or recycled on site in 1091 Or	N-SITE SYSTEM 2 site system type — Quantity treated, disposed or recycled on site in 1951 toge 19 Liti — — — — — — — — — — — — — — — — — —
Sec. A Was any of this waste shipped off site in 1981? Yes (CONTINUE TO BO 2 No (SKIP TO SEC. M)	iX β)
Site B. EPA ID No. of facility waste was shipped to Page 20 O. A. D. D. C. C. L. G. at 1.7.6.3	D. Off-site availability code Page 21 E. Total quantity shipped in 1991 Page 21
Site B. EPA ID No. of facility waste was chipped to Page 20 Fage 20	d to U. Off-site availability roce Page 21 E. Total quantity shipped in 1991 Page 21
	NTIMUE TO BOX (1) I FORM IS COMPLETE)
E. Activity C. Other effects D. Quantity recycled in 1901 due to new activities 22 Page 22 Page 23	Page 23 Fage 24
Comments:	et produktion. Mendet volkkus i interes konduction beliefen beforet. A tritttyst beläveten te det som produktion in transport

Page <u>30 of .</u>

SEFORE COPYING FORM, ENTER:	
SITE NAME ARSYNCO, INC. P. O. BOX 8, FOOT OF 13 95T, CARLSTANT, N.J. 07072	1991 Hazardous Waste Report
EPAID NO. WITW 16 18 18 18 18 18 18 18 18 18 18 18 18 18	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 ct	the 1991 Hazardous Waste Report booklet before completing this to
Sec. A Waste description LAA PACK RO WASTE MAGNES/U	METAL TURNINGS
B. EPA hazarcous waste code DIDIDIS WILL I WALL	C. State hazardous waste code Page 15
D. SIC code Page 16 E. Origin code	G. Point of measurement Page 17 L. PCRA-radioactive mit Page 17 L. PCRA-radioactive mit Page 17 L. PCRA-radioactive mit Page 17
J. Reported TRI constituent Page 18 L. W. J.	
Sec. A Quentity generated in 1990 III Instruction Page 18 WIA	C. UOM Density Page 19 D. Did this site do any of the following to the vaste: treat on site, dispose on site, recy on site, or discharge to a sewer/POTW? Page 19 1 1 be/get 2 sg 2 No (SKP TO SEC. iii)
On-site system type Quantity treated, disposed or recycled on site in 1931 Q	N-SITE SYSTEM 2 n-side system type
Sec. A. Was any of this waste shipped off site in 1991? If Yes (CONTINUE TO BO Instruction Page 20 If You (SKIP TO SEC. IV)	
Site 8. EPA D No. of facility waste was shipped to Page 20 PAID 01815 61810 51812 1M1014131	D. Off-site satisfability code Page:21 E. Total quantity shipped in 1991 Page 21
PUID DIST 618 0 518 2	nd to D. On-site availability code Fage 21 Fage 21 Page 21
THE RESIDENCE OF THE PROPERTY	NTINUE TO COMPLETE)
B. Activity C. Cthur effects D. Quantity recycled in 1691 due to new up Page 32 Page 32 Page 22 Page 23	
WI WI DI Yes DI Yes WI WI WI WI WI WI WI WI WI WI WI WI WI	
Comments:	
	Page <u>31</u> of 3

	• ·
BEFORE COPYING FORM, ENTER:	
SITE NAME ARSYLY CO, TNC	
P.O. DOX 8, FOOT OF 13 ST. CHRISTAN, N. J.	1991 Hazardous Waste Report
EPAID NO. WID 10 1914 61818 91315	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 or	the 1991 Hazardous Waste Report booklet before completing this for
Sec. A Waste description LABI-PACK - RQ WASTE OL Instruction Page 15	EVM
B. EPA hazerdous waste code DIDIDIZ WWIII	C. State hazardous waste code Fage 15
MAIL MAIL MAIL	MAILLI MALLI
D. SIC code E. Origin code L. F. Source code Page 18 Fage 17	G. Point of measurement H. Form code Page 17 L. RCRA-radioactive mo
121813141 System type IMWIQI IAISIKI	T) BOAT S
J. Reported TRI constituent Page 18 K. CAS numbers Page 18 1. WW	111.11.11 2 XXXX
2 WWIII-LI-LI 4.	MALLI-LI-L & WALLI-LI-L
Sec. A. Guentity generated in 1593 Instruction Page 18 B. Quentity generated in 1991 Page 18 Multiple 18 [Multiple 18 18 18 18 18 18 18 18	C. UOM Density Page 18 D. Did this site on any of the following to this waste: treat on site, dispose on site, racy on site, or discharge to a sewer/POTW? Page 18 1 Yes (CONTINUE TO SYSTEM 1) 1 Yes (CONTINUE TO SYSTEM 1) 2 No (SXIP TO SEC. III)
On-site system type Quantity treated, disposed or recycled on site in 1891	DVI-SITE SYSTEM 2 DVI-SITE SYSTEM 2 DVI-SITE SYSTEM 2 Cuantity treated, disposed or recycled on site in 1991 Page 19 LMI LMI LMI LMI LMI LMI LMI LM
Sec. A. Was any of this waste shipped off site in 15617 [III Instruction Page 20	OX Ej
Site 6. EPA ID No. of facility waste was shipped to C. System type shipp 1 Fage 20 Page 20	ed to D. O'l-site availability case E. Total quantity shipped in 1681 Page 21 Page 21
PAD 0875 6910 592 1M101411	<u> </u>
Sit0 8. EPA ID No. of facility weste was shipped to C. System type shipp 2 Page 20 Page 20	ed to D. Citate availability code E. Total quantity shipped in 1591 Fage 21
W ₁ A ₁	
I I	MINUE TO BOX BI S FORM IS COMPLETE)
B. Activity C. Cither exists D. Countity recycled in 1991 due to new or Page 22 Page 23	
W	
C.S. + NO PROCESSIONAL CONTRACTOR AND CONTRACTOR AN	то водинения от водинения с том от тенеродине в водинения водинения учение водинения от водинения водинения в Стать водинения в сот предусме уторы вот о из выпоры компоры водинения водинения стать водинения
Comments:	Lefted Wife 1978 Change September 2014 Library 2014 Libra
- The sumplest where the participant is the substitute of the s	Page 32 of
TULING PERMATERU BINALI DI MARI LI MANTENDI PERMATENTAN MANDEL DENGANGAN DEN DE TOM MERANDE ANTENNAS PERMANEN	control and another control and the control of the second and are a simple control of the rest of the rate of

BEFORE COPYING FORM, ENTER: SITE NAME ARSYNCO, INC.	
POUBOX8, FOOT OF 13 \$55, CARLSTADT, N.S. 07072	1991 Hazardous Waste Report
EPAID NO. PHID 085 6910 51912	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Road the detailed instructions beginning on page 13 of	the 1991 Hazardous Waste Report bookiet before completing this f
Sec. A Waste description LAB-PACK-RQ WASTE HYDROF	LUORIC ACID SOLUTION
B. EPA nezargous weste code U//3 K/ W/21 W	C. State hazardous waste code Page 15 WIA
D. SXC code Page 16 E. Origin code [] Page 17 C. S. System 1/pe M. M. M. M. M. M. M. M	G. Point of measurement H. Form tode Page 17 Page 17 Page 17
J. Peponed Tre constituent Page 18 L J. WWI J. WWI A.	
Sec. A Quantity generated in 1990 Instruction Page 18 B. Quantity generated in 1991 Page 18 W.W.	C. UOM Density Page 18 D. Did this site do any of the following to the waster treat on site, dispose on site, re on site, or discharge to a sewer/POTV/Page 19 1 the /gai 2 ag 2 No (SIGP TO SEC. III)
On-site system type Quantity treated, disposed or recycled on site in 1281 C	N-SITE SYSTEM 2 n-site system type Outentity treated, disposed or recycled on site in 1831 age 19 [M]
Sec. A. Was any of this waste shipped off site in 1891? Yes (CONTINUE TO 50 1 1 2 2 No (SYJP TO SEC. IV) 2 No (SYJP TO SEC. IV)	OX E)
Site B. EPA ID No. of facility waste was shipped to Fage 20 PAID 01815 6810 5182 IMID 1719	D. Off-site availability code Page 21 E. Total quantity shipped in 1991 Page 21
Site E. EPA ID No. of facility weste was chipped to Page 20 Page 20	
NA A STATE OF THE PROPERTY OF	THE RESIDENCE OF THE PROPERTY
	a road of Buntin Fermo etaphoo etapho
2. Activity C. Caher edirete D. Quantity recycloid in 1901 due to new and Page 22 Page 23	Miles E. Activity / Jaroduction Index F. 1991 Source reduction quantity Pegs 23 Page 24
W	
Comments:	THE CONTROL OF THE CONTROL OF THE PARTY OF T

	Control of Control of
BEFORE COPYING FORM,	
ENTER: SITE NAME ARSYNCO, FNC	
P.O.BOXE, FONT OFB TI, CARSTAUT, N. J. 07072	1991 Hazardous Waste Report
· · · · · · · · · · · · · · · · · · ·	CODI
EPAIDNO. WOW LIGHT GESTSTEIZIST	FORM WASTE CENERATION AND
ANAMANAMANINAMANAMANAMANAMANAMANAMANAMAN	GM MANAGEMENT
INSTRUCTIONS: Read the detailed instructions beginning on page 13 of	the 1991 Hazardous Weste Report booklet before completing this fo
Sign. A. Waste description LAB-PYCK RQ WHSTE WATER REA	CTIVE SOUD, IV. U.S.
B. EPA hazardous warte code	C. State hazardous weste code Fage 15
PIOIORI WALLI MAILI	WIA WIA
D. SIC code E. Origin code L F. Source code Page 18 Page 18 Page 17	G. Point of measurement H. Form code I. RCRA-radioactive min Page 17 Page 17
121813151 System type 1411/141 1419151	ि । । । । । । । । । । । । । । । । । । ।
J. Reported TRI constituent K. CAS numbers Page 18 1. W.H.	LLI-LLI-L 2 KM/4 LLI-LLI-LI
2 WWI	VVKIIIIIII : WWXIIIIIII
Sec. A. Cuantity generated in 1990 B. Quantity generated in 1991 Page 16	C. UOM Density D. Did this site do any of the following to this Page 18 Weste: treat on site, dispose on site, recy
WV4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	cn.site/or discharge to a sewer/POTW? Page 19 I Yes (CONTINUE TO SYSTEM
	1 lbs/Sai 2 sg 2 No (SKGP TO SEC. III)
Conside system type Quantity treated, disposed or recycled on site in 1991 C	N-SITE SYSTEM 2 Cuantity treated, disposed or recycled on site in 1991
Page 18	ige 19
Sec. A. Was any of this waste shipped off site in 1591? 1 Yes (CONTINUE TO SO	soukaikausilanteistäväänin olevakielijaniusuvan kuintaksin mukeisen valitaas: mastataa, ejannistuu Viintoman ja nen olevatuutuun puolinen nen ja niintomaanin ja nen ja ja kuutain valituutiinen, eja mannava Y-Pt
III Instruction Page 20 2 No (SXIP TO SEC. M)	
Site 8. EPA ID No. of facility waste was shipped to Page 20 Page 20	d to D. Off-site availability code Page 21 E. Total quantity shipped in 1981 Page 21
PHU 0 8 5 6 8 0 5 18 12 1 11/01/51 31	1/2 1111115.6
Site B. EPA ID No. of facility waste was shipped to C. System type shipped 2 Page 20 Page 20	d to D. Off-site availability code E. Total quantity shipped in 1891 Page 21
N _A	- Land -
	(TINUE TO BOX 5) FORM IS COUPLETE)
C. Ciber effects D. Countity recycled in 1991 due to now est Paga 22 Paga 22 Paga 22 Paga 23	
NY W 2 Ro	MODELS COM AND THE ANTONIO THE STREET, STREET, MANAGES, MODELS, CONTRACTOR OF STREET, SO SECTIONS OF STREET, SALVEY, S
Comments:	markett maart var Mild, par flessig Sprijk Silvett brende lit door flesse die Stielste flesse flesse flesse bie bei Stielste bei de stielste bei bei de stielste bei de stielste bei bei de stielste bei de st
A CONTRACTOR OF THE PROPERTY O	padahanga mengahantan kengan kengan kanggaran panggahan penggahan dalah dan 1. Calabahan pagaran banggaran penggaran penggaran banggaran banggaran banggaran penggaran penggaran banggaran bang

	the property of the property o
BEFORE COPYING FORM,	ON-MARKET?
SITE NAME ARSYNCO, FNC.	
P.O. BOX 8, FOOT OF 13 ST, CARLSTANT, N.J. 0707	1991 Hazardous Waste Report
EPAID NO. WID 10 1414 61818 151315	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Pead the detailed instructions beginning on page	a 13 of the 1991 Hazardous Waste Report booklet before completing this fo
Sec. A Vieste description Instruction Page 15 LAB - PHICK - RQ WHSTE FLAM	MMABLE LIQUID, CORROSINE N.O.S.
B. EPA hezardous waste code DIDIDI/I DIDIDIZI Page 15	C. State hezardous waste code Page 15
WALL WALL WALL	LI WWILL WAR
D. S.C code Page 18 E. Crigin code F. Source code Page 18 F. Source code Page 17	G. Point of measurement H. Form code Page 17 L RCRA-radioactive mi
J. Feponed TRI constituent K. CAS numbers Page 18 1.	<u> </u>
3 18 11 - 11 - 11	4. WW
Sec. A. Quantity generated in 1890 Il Instruction Page 18 B. Quantity generated in 1891 Page 18	C. UCM Density D. Cid this site do any of the Islawing to this yeaste; treat on site, dispose on site, recy on site, or discherge to a sewer/POTW?
	Page 18 Page 18 1 Yes (CONTINUE TO SYSTEM 1 Ibe/gai 2 sq ST2 No (SKIP TO SEC. III)
CN-SITE SYSTEM 1 Cn-site system type Page 19 UNITED SYSTEM 1991 Quantity treated, disposed or recycled on site in 1991	On-site system type Ournitry tropped, disposed or recycled on site in 1991 Page 19
Sec. A. Was any of this waste shipped off site in 1591? III	
Site B. EPA ID No. of facility waste was shipped to C. System type 1 Fage 20 Page 20	D. Off-site availability cods Fago 21 E. Total quantity shipped in 1991 Fago 21
PIDID 01815 6010 5192 1M1014	44 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Site 6. EFA ID No. of facility waste was shipped to C. System type Page 20	o shipped to D. Cit-site availability code Page 21 E. Total quantity shipped in 1991 Fage 21
T de la companya del la companya del la companya del la companya de la companya de la companya del la companya de la companya del la companya del la companya del la companya del la companya del la companya del la companya del la companya del la c	
	CONTINUE TO BOX (I) (THIS FORM IS COMPLETE)
III. Activity C. Other effects D. Quantity recycled in 1991 due to Propo 22 Propo 23	nematistics E. Activity/production index F. 1891 Source reduction quantity Page 24
W	
	 The finishing designed in the second of the s

BEFORE COPYING FORM, ENTER:		
SITE NAME ARSYNCU, FNC.		•
P.O.BOXE, FOOT OF/3 #ST, CARLSTADTAL. 07072	1991 Hazardous Wa	iste Report
EPAID NO. WITID 01414 61818 9315	FORM WASTE GENERAT MANAGEME	
INSTRUCTIONS: Read the detailed instructions beginning on page 13	of the 1991 Hazardous Waste Report booklet before com	npleting this for
Sec. A Weste description LAB-PACK - RQ WASTE CUMEN	IE HYDROPENOXIDE	Out and a substitute of the su
B. EPA hazardour waste code DODD DO	C. Stale hazardous vaute code Page 15	
WWII WWII WWII	J WWIII WAA	
0. SiC code Page 18 E. Origin code [] Page 18 [2 18 18 19 19] E. Origin code [] Page 17 [2 18 18 19 19] [3 19 19 19] [4 19 19 19] [5 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		CPA-radioactive mb lage 17
J. Reported TRI constituent Page 18 K. CAS numbers Page 16 1. WW	WW111-11-11 = WKI111	
Sec. A Quantity generated in 1900 B. Quantity generated in 1991 Page 18 Page 18	C. UOM Density Page 19 D. Did this site do any of waste: treat on site, of chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, of chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, of chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, of chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, of chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, of chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, of chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, of chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 This /gai 2 ag D. Did this site do any of waste: treat on site, or chuckarga to page 19 D. Did this si	ispose on sile, recy a a sewer/POTYY? INUE TO SYSTEM 1
CALSITE SYSTEM 1 Chi-site system type Quantity treated, disposed or recycled on site in 1991 Page 13 M	ON-SITE SYSTEM 2 On-site system type Ouanity treated, disposed or recycled Page 19 Mill III	on site in 1901
Sec. A. Was any of this weste shipped of:le in 19917		
Sito 8. EPA to No. of facility waste was shipped to Pege 20 Pege 20	pped to D. Čdf-sãe availability code Fage 21 E. Total quaritity shipped in 11	991
PADOBS 60050K IMOK		٠٠٠ ا <u>ک</u> ا ١٤
Site D. EPA ID No. of facility waste was shipped to C. System type an Page 20	pped to D. Off-site evaluability code Page 21 E. Total quantity shipped in 11 Fage 21	φει
	TO THE CONTRACTOR OF THE PROPERTY OF THE PROPE	COLUMN COMPANY
	CONTINUE TO EOX (5) IT IS FORM IS COMPLETE)	·
		n quantity
E. Astroby C. Other effects D. Quantity recycled in 1801 due to new Fege 22 Fage 23	Page 24	
Page 22 Fage 23		111.1

BEFORE COPYING FORM,	
SITE NAME ARSYNCO, TINC.	
P.O.BOX8, FOUTUF13 #ST, CARLSTANTA. 57072	1991 Hazardous Waste Report
EPAIDNO. WINDOUSE BEST	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Road the dotailed instructions beginning on page 13 of	the 1991 Hazardous Waste Report booklet before completing this fo
Sec. A. Waste description LAB - PACK RQ WASTE URGANIC Instruction Page 15	PEROXIDE
B. EFA hazargous waste code DIDIDI/ DIDIDI3	C. State hiszardous weste code Page 15
MAITI MAITI MAITI	MAILLI WILLI
O. SIC code Fage 18 E. Origin code [] F. Source code Page 17 C. 18 C	G. Point of measurement H. From code Page 17 Page 17 Page 17 Page 17
I Reported Till constituent	
Page 18 Page 18 1. WWW	
Sec. A. Cuantity generated in 1990 Instruction Page 13 B. Ovanity generated in 1991 Page 13	C. UOM Density Page 19 D. Did this site do any of the following to the waste: treat on site, dispose on site, recipitation, discharge to a sever/POTW? Fage 19 1 Yes (CONTINUE TO SYSTEM
WELLING CONTRACTOR	1 lbs/gel 2 sg CONTINUE TO SYSTEM
Programme recognised to the control of the control	N-SITE SYSTEM 2 site system type
Sec. A Was any of this waste shipped off site in 1991? 1	жения по при при при при при при при при при при
Site B. EPA ID No. of facility waste was shipped to C. System type shipped 1 Page 20 Page 20	d to D. Cri-site availability acces E. Total quantity shipped in 1991 Page 21
PRO 082 800 2125 MO1417	LILLIKE.
Situ 3. EFA tO No. of facility waste was shipped to C. System type shipped 20 Page 20 Page 20	d to D. Off-site availability code E. Total quantity shipped in 1891 Page 21
Landan Angele and a resident control of the control	Particular description of the second
	NTINUE TO BOX (1) FORM IS COMPLETE)
B. Activity C. Other effects D. Currelity recycled in 1501 due to new net Page 22 Page 23	Wiles E. Activity/production index F. 1931 Source reduction quantity Page 23 Fogol24
W W 1 Yes	
	en de la composition della com

BEFORE COPYING FORM, ENTER: SITE NAME ARSYNCO, FACO	
P.O. BOX 8, FOUT OF 13 TSTY, CARLSTANT, N.J. 07072	1991 Hazardous Waste Report
EPAIDNO. WID DHIH 688 9315	FORM WASTE GENERATION AND MANAGEMENT
INSTRUCTIONS: Road the detailed instructions beginning on page 13 of	the 1991 Hazardous Waste Peport booklet before completing this for
Sec. A. Waste description LAB-PIACK - RQ WASTE PH US PHOR	US AM ORPHUS, RED
B. EPA hazardous viaste code	C. State hazardours waste code Page 15
D. SiC code E. Origin code F. Source code Page 16 Page 18 F. Page 17	G. Point of measurement H. Form code L. RCRA-radioactive mb Page 17 Page 17
RISISIYI System type IMINIKI IA 19 141	ि । । । । । । । । । । । । । । । । । । ।
1	
Sec. A Quantity generated in 1900 B. Quantity generated in 1991 Il hatruction Page 18 Page 18	C. UOM Censity D. I divis set do any of the following to this years treat on site, dispose on site, racy on site, or discharge to a swar/POTW?
<u> </u>	Page 18 1 Yes (CONTINUE TO SYSTEM) 1 Ibs/gai 2 sg 2 No (SKIP TO SEC. II)
Chesite system typo Cuentilly tracted, disposed or recycled on site in 1991.	IN-SITE SYSTEM 2 Guantity treated, disposed or racycled on site in 1991 age 19
IMI-I-I-I-I-I-I-I-I-I-I-I-I-I-I-I-I-I-I	
Sec. A Was any of this waste shipped off sae in 1991? I'll Instruction Page 20	ox e)
Site B. EPA ID No. of facility wests was shipped to C. System type shipped 1 Fage 20 Page 20	D. Off-site availability code Page 21 E. Total quantity shipped in 1981 Page 21
PAD 685 6186 588 1MO 43	V. L.
Site B. EPA ID No. of facility waste was shipped to C. System type shipped 2 Fage 20 Page 20	od to O. Off-site expitability code Page 21 E. Total quantity shipped in 1991 Page 21
WALL	
	etales de la BOX Bj B FCRM IS COMPLETE)
D. Activity C. Other relects D. Quantity recycled in 1891 due to new so Fract 22 Proje 23	ikities E. Activity/production index F. 1801 Source reduction quantity Page 24
W	·
	mpersonen erkaturungen og virteren kersin menne månka kortal kryssi it utbinstissenska filmstembersonen er atv De med erker kritika latt vir från attignism hande konneler er, hvi den elga utbinstissenska filmstembersonen
Comments:	
于,从在14、19分别的19.4以上,19分别的1965的时间,1969的1950 400 18 18、下午67、1988年1979年1979年1979年1979年1979年1979年1979年	17690 38 of .

BEFORE COPY	YING FORM,			•	• •
SITE NAME	ARSYNCO, IN	1C		199	1 Hazardous Waste Report
		·	FORM	 1	F-SITE IDENTIFICATION
EPA ID NO.	N,J,D 0,4,4 6,8	8 9 3 5	OI		
INSTRUCTIO	NS: Read the detailed instru	ctions on the back of this page	before complet	ing this form.	
Site A. EPA ID No. o	off-site installation of transporter	8. Name of off-site installation or transp	porter	<u> </u>	
	0 0 2 4 5 4 5 4 4	MARISOL, INC.		·····	
C. Handler type	(CHECK ALL THAT APPLY)	D. Address of off-site installation	_	The state of the s	
1	Generatór Tránisponer	Street 125 Factor	y Lane		
1	TSDR	CHy Middlesex	State	N.J. Zip Code	0,8,8,4,6,-
Site A EPAID No. 6	of off-site installation or transporter 0,9	B. Name of off-site installation or trans OLDOVER CORP.	porter		
C. Handler type	(CHECK ALL THAT APPLY)	D. Address of off-site installation	· · · · · · · · · · · · · · · · · · ·	1.	
	☐ Generator	Street Route #1,	State Rœ	ad 652	
	☐ Transporter ☐ TSDR	chy <u>Arvonia</u>	State	VA: Zip Code	1213010141-111
[00]	of off-site installation or transporter	B. Name of off-site installation or trans	porter	× • • • • • • • • • • • • • • • • • • •	· · · · · · · · · · · · · · · · · · ·
131	11 11 4	ì			
VAD	0,4 10 11 519 43 16	OLDOVER CORP.			
	014 10 11 519 43 16 (CHECK ALL THAT APPLY)	OLDOVER CORP. D. Address of off-site Installation		·	
VAD			NA		
VAD	(CHECK ALL THAT APPLY)	D. Address of off-site installation		Zip Code	
C. Handler type Site A EPA ID No. c	(CHECK ALL THAT APPLY) Generator Transporter TSDR If off-site installation or transporter	D. Address of off-site Installation Street City B. Name of off-site installation or trans	NA State	Zip Code	
C. Handler type Site A EPAID No. of 4	(CHECK ALL THAT APPLY) Generator Transporter TSDR	D. Address of off-site Installation Street City B. Name of off-site installation or trans WASTE CONVERS	NA State		
C. Handler type Site A EPA ID No. c	(CHECK ALL THAT APPLY) Generator Transporter TSDR If off-site installation or transporter	D. Address of off-site installation Street City B. Name of off-site installation or trans WASTE CONVERS D. Address of off-site installation	NA State porter		
C. Handler type Site A EPAID No. of 4 P.A. D C. Handler type	(CHECK ALL THAT APPLY) Generator Transporter TSDR of off-site installation of transporter OR 15 6 19 10 5 9 2 (CHECK ALL THAT APPLY) Generator	D. Address of off-site Installation Street City B. Name of off-site installation or trans WASTE CONVERS D. Address of off-site installation Street 2869 Sands 1	NA State porter	/e	
C. Handler type Site A EPAID No. c 4 P; A; D C. Handler type	(CHECK ALL THAT APPLY) Generator Transporter TSDR of off-site installation of transporter OR 5 6 9 0 5 9 2 (CHECK ALL THAT APPLY)	D. Address of off-site installation Street City B. Name of off-site installation or trans WASTE CONVERSI D. Address of off-site installation 28 6 9 Sands f	NA State porter	/e	1191440-111
C. Handler type Site A EPA ID No. of 4 P:-A: D C. Handler type	(CHECK ALL THAT APPLY) Generator Transporter TSDR It off-site installation or transporter 08 5 6 9 0 5 9 2 (CHECK ALL THAT APPLY) Generator Transporter	D. Address of off-site Installation Street City B. Name of off-site Installation or trans. WASTE CONVERS I D. Address of off-site Installation Street 2869 Sands t Hatfield	NA State porter ION, INC. tone Driv State	/e	1.9.4.4.0
C. Handler type Site A. EPA ID No. c 4 P.A. D C. Handler type	(CHECK ALL THAT APPLY) Generator Transporter TSDR of off-site installation of transporter OB S 6 9 0 5 9 2 (CHECK ALL THAT APPLY) Generator Transporter Transporter	D. Address of off-site installation Street City B. Name of off-site installation or trans WASTE CONVERS D. Address of off-site installation Street City Hatfield B. Name of off-site installation or trans	NA State porter ION, INC. tone Driv State	/e	1.9.4.40-
C. Handler type Site A EPA ID No. o P.A. D C. Handler type Site A EPA ID No. o Site A EPA ID No. o	(CHECK ALL THAT APPLY) Generator Transporter TSDR of off-site installation of transporter OB S 6 9 0 5 9 2 (CHECK ALL THAT APPLY) Generator Transporter Transporter	D. Address of off-site Installation Street City B. Name of off-site Installation or trans WASTE CONVERS D. Address of off-site Installation Street City Hatfield	NA State porter ION, INC. tone Driv State	/e	1.9.4.4.0-
C. Handler type Site A EPA ID No. o P_A_ D C. Handler type C. Handler type	(CHECK ALL THAT APPLY) Generator Transporter TSDR of off-site installation or transporter O8 5 6 9 0 5 9 2 (CHECK ALL THAT APPLY) Generator Transporter Transporter TSDR	D. Address of off-site installation Street City B. Name of off-site installation or trans WASTE CONVERS D. Address of off-site installation Street City Hatfield B. Name of off-site installation or trans	NA State porter ION, INC. tone Driv State	re	1.9.4.4.0
C. Handler type Site A EPA ID No. o P_A_D C. Handler type C. Handler type	(CHECK ALL THAT APPLY) Generator Transporter TSDR off-site installation or transporter (CHECK ALL THAT APPLY) Generator Transporter Transporter TSDR off-site installation or transporter (CHECK ALL THAT APPLY) Generator (CHECK ALL THAT APPLY)	D. Address of off-site installation Street City B. Name of off-site installation or trans WASTE CONVERSI D. Address of off-site installation Street 2869 Sands t City Hatfield B. Name of off-site installation or trans D. Address of off-site installation	NA State porter ION, INC. tone Driv State	/e	1191440-111
C. Handler type Site A EPA ID No. o P_A_D C. Handler type C. Handler type	(CHECK ALL THAT APPLY) Generator Transporter TSDR T off-site installation or transporter (CHECK ALL THAT APPLY) Generator Transporter Transporter (CHECK ALL THAT APPLY) Generator (CHECK ALL THAT APPLY)	D. Address of off-site installation Street City B. Name of off-site installation or trans WASTE CONVERSI D. Address of off-site installation Street City Hatfield B. Name of off-site installation or trans O. Address of off-site installation Street	NA State porter ION, INC. tone Driv State	re	19440-
C. Handler type Site A EPA ID No. o P-A D C. Handler type C. Handler type C. Handler type	(CHECK ALL THAT APPLY) Generator Transporter TSDR T off-site installation or transporter (CHECK ALL THAT APPLY) Generator Transporter Transporter (CHECK ALL THAT APPLY) Generator (CHECK ALL THAT APPLY)	D. Address of off-site installation Street City B. Name of off-site installation or trans WASTE CONVERSI D. Address of off-site installation Street City Hatfield B. Name of off-site installation or trans O. Address of off-site installation Street	NA State porter ION, INC. tone Driv State	re	19440-

ATTACHMENT E

ENFORCEMENT ACTIONS FOR VIOLATIONS (ITEM 3. OF SES)

Form HWM-004 3/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT

5th Ft., 401 E. State St., Trenton, N.J. U8625

2 Babcock Place west orange, Niv

NOTICE OF VIOLATION

ID NO. AJJOO44688935 DATE 3/15/89
NAME OF FACILITY ATSYNCO INC.
LOCATION OF FACILITY FOOT OF 13 th St. Carlstadt
NAME OF OPERATOR Jack Feder Tech. P.T.
You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C.
7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A.
58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed.
These violation(s) have been recorded as part of the permanent enforcement history of your facility.
DESCRIPTION OF VIOLATION N. J. A. C. 7!26 - 9,2 ()
discharge of methanol & water into a su
arscharge or recover to war into a series
ALLIANCE DICAL
NJAC7:14A Qischarge of a
pollutent methodol & water into a
Sewer
Remedial action to correct these violations must be initiated immediately and be completed by
Immediately Within fifteen (15) days of receipt of this Notice of Violation, you
shall submit in writing to the investigator issuing this notice at the above address, the corrective measures
you have taken to attain compliance. The issuance of this document serves as notice to you that a
violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initi-
ating further administrative or legal action, or from assessing penalties, with respect to this or other
violations. Violations of these regulations are punishable by penalties of \$25,000 per violation.

669-3960

Investigator, Division of Waste Management of Department of Environmental Protection

TERRY, COOPER, EDGERSH, DAGIS, POPPER & CARNEY

COMBRETT OPS AT LAW

APP MORE AVERUE

SUMMIT HEW JERSLY 0/2001-1583

PP HAPITE, MESSER off samples

JEPPY FÜZGEPÄLD TEFSHSEL APHÄP IL GAPVÖTÜL HEIWAPD IL POPHER* CAPY E DANIS IN E

PERMITT PERMY OF *

PARTA CAMAR

FPEDIT PEARLAUTTEP *
PENEDICT J MONACHINO

**IS SADMITTED BERY

अल्प 🛫 प्राप्तान

T OP 13/1 10: 27 E

FEDERAL EXPRESS AND CERTIFIED R.R.R.

March 29, 1989

Arnold Schiff, Investigator New Jersey Department of Environmental Protection Division of Hazardous Waste Management 2 Babcock Place West Orange, NJ 07052

Re: Arsynco, Inc.

Notice of Violation - March 15, 1989

Dear Mr. Schiff:

This firm represents Arsynco, Inc. as environmental counsel. The purpose of this letter is to respond to the referenced Notice of Violation.

The Arsynco facility has a New Jersey Pollution Discharge Elimination Permit # NJ0030970 and a Bergen County Utilities Authority (BCUA) permit both covering discharges of process waste water to the sewer. Under the permits Arsynco is permitted to discharge process water containing solvents which may be considered hazardous wastes.

Furthermore, under NJAC 7:26-8.9, aqueous solutions containing less than 24% alcohol by volume are not considered hazardous wastes. Therefore, under NJAC 7:26-9.2 (c) 1 and 2 and NJAC 7:14A et seq, Arsynco is not in violation as cited.

The controlling limit on Methanol is the Lower Explosive Limits imposed under the BCUA permit which contains a 10% LEL upper limit. Arsynco is under an obligation under the permit to notify BCUA when the limit is exceeded. In order to keep all agencies informed, Arsynco's policy is to also call NJDEP at the same time.

As described in the attached letter to the Division of Water Resources, after further investigation Arsynco does not believe that there was an LEL exceedance but rather a measuring equipment problem. It is taking steps to correct this and is working with Kathleen Beyer on insuring that the facility complies with the NJPDES permit.

Arnold Schiff March 29, 1989 Page -2 -

Arsynco has taken a conservative approach in calling the "Not Line" at NJDEP whenever it also notifies BCUA. This may occur even though no circumstances exist, as in this case, which in fact endanger health or the environment. The LEL permit limit has in fact a substantial safety factor in order to insure that corrective action is taken before a danger develops.

Arsynco desires to maintain a cooperative relationship with NJDEP but believes that some procedural methods should be worked out so that it does not receive a Notice of Violation everytime it makes a notification of a potential problem based upon a possible BCUA or NJPDES permit exceedance. Perhaps a meeting between yourself, Kathleen Beyer, a BCUA representative and Arsynco could be arranged in order to discuss reporting requirements.

Please contact me to further discuss this.

Very truly yours,

Gary F. Danis

GFD:hjs

cc: K. Beyer

S. Mizerek

D. Space

W. Bennett

J. Feder

J.F. English

enclosure: Copy of letter to NJDEP from

W. Bennett (Arsynco) dated

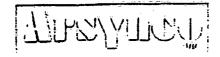
March 21, 1989.

THAT HWM 004

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT

		5pb-Ft., 401 E. Store Gr.	Transpr ₁ (1. 08025		C4 Plac
7WM89=	08-17-1285-	NOTICE OF V	/IOLATION		range 1
ii No.	N 300 44 688	13 5	ATE G	11/89	
	or commendation				
	JAKELITY & FOO	+ 04 12	HURL C	erictell.	
	SERVICE WES	ey Benne	t L'ENZ	co-ordinat	e/
		V-Warning.			
	NOUTED that o			seq: and Regulati	A CONTRACT OF THE PARTY OF THE
	stonulgated, the	reunder and/or th	Spill Compense	tion and Control.	Act, [N.J.S.A.
581U	THE RESERVE OF THE PERSON OF T				
					5/
	TRIONOF VIOLATIO	N N.O. A.		- Urjek	3790
		at Wit	kasta a	ye Conit	
3				AND STATE OF	
					i sterio
		MARCE STREET			
					A CONTRACTOR OF THE CONTRACTOR
		ALCOHOL:			
Remed	Userial attended to	iolations must be in	litare inmediate	ly and ba completed	l by
		Within fifteen	iti sherda in	contails Notice of	Violation, you
	Links of the links and in	etloetor issuint illi	notic varing abou	e address, the corre	ctive measures
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	្សី និង និង ប្រជាពិធីក្នុង ប្រើប្រើប្រើប្រើប្រើប្រើប្រើប្រើប្រើប្រើ	是一种"对外"的"一种"的"一种"的"一种"的"一种"。	The state of the s	THE RESERVE OF THE PARTY OF THE	Par de la la la la la la la la la la la la la
	The Line Brang of			THE REAL PROPERTY.	A Part Control of the
THERE				The second second second second	2 8 - C
	Wasterstand	Allerie lar-			37.5
	ONE STEELS	-	and	124	

Investigator, Division of Weste Magagement
Department of Environmental Protection



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

June 4th, 1989

Mr. Arnold Schiff, Investigator N.J. Department of Environmental Protection Division of Hazardous Waste Mgmt. 2 Babcock Place West Orange, New Jersey 07052

> RE: Notice of Violation Dated 6/1/89 DWM 89-05-17-1255

Dear Mr. Schiff:

On May 17th, 1989, we notified the department that we had overfilled a tank, and that the material that was overflowed was contained in a dike. At no time did we say that we had a discharge. We are still under the impression that since the overflowed material was contained in a dike and recovered from that dike that we had no discharge.

We were surprised that we are being cited for a violation and especially being cited under N.J.A.C. 7:14A. Since there was no discharge to our treatment pit or to our non-contact cooling water pond which discharge to Derry Creek. In fact we do have a permit to discharge xylene from our treatment pit.

Description of the immediate actions that have been taken and the estimated quantity and disposition of recovered material that resulted from the overflowing of the tank --Once discovered the xylene was promptly pumped out of dike. The recovered xylene was distilled and returned to our inventory of raw materials. The dirt in the dike that contained xylene will be removed, tested, and disposed of if found contaminated following all local, state and federal regulations.

Implementation Schedule For Undertaking Suggested Measures
To Eliminate The Problem

Mr. Arnold Schiff, Investigator (continued)

SHORT TERM- Log is being kept of what is pumped to tank, operators cannot pump to tank until Supervisor gives permission. Supervisor will make sure that there is room in the tank before pumping to the tank. (By having the tank sticked)

IMPLEMENTED ALREADY

LONG TERM - Level controller will be installed

Sincerly yours,

WESLEY BENNETT
MGR. REGULATORY AFFAIRS

UB/nd





NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY CN 027, TRENTON, NJ 08625



IN THE MATTER OF

ADMINISTRATIVE ORDER AND

ARSYNCO, INC.

NOTICE OF CIVIL ADMINISTRATIVE

FT OF 13TH ST.

PENALTY ASSESSMENT

CARLSTADT, N.J. 07072 LOG #A891483 MRA, CDS

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:ID-1 et seq., and the Air Pollution Control Act, N.J.S.A. 26:2C-1 et seq. (the "Act"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:IB-4.

FINDINGS

1. As the result of an investigation conducted on April 19, 1989, the Department has determined that at your facility located at Ft. of 13th Street, Borough of Carlstadt, Lot(s) 1E, Block(s) 146, County of Bergen, State of New Jersey, (ID #00098) you constructed, installed, or altered the following equipment without obtaining the required Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit"), in violation of N.J.A.C. 7:27-8.3(a):

Exhaust system venting a propylene imine filling line.

ORDER

- 2. NOW, THEREFORE, IT IS HEREBY ORDERED THAT on or before July 7, 1989, you submit the required Permit and Certificate to Operate Control Apparatus or Equipment ("Certificate") application(s) VEM-003 and VEM-004 to the Bureau of New Source Review to obtain a Permit(s) and Certificate(s) for the equipment listed in Paragraph I above. If the required Permit and Certificate application(s) is not submitted by the above date, you must cease installation/operation of such equipment.
- 3. IT IS FURTHER ORDERED THAT on or before October 7, 1989, you obtain an approved Permit(s) and Certificate(s). If the required Permit and Certificate is not obtained by the above date, you must cease installation/operation of the equipment listed in Paragraph I above.

PENALTY

4. Based upon the above FINDINGS, and a review of the entire matter, the Department hereby assesses a Civil Administrative Penalty against you in the amount of \$400.00. Payment must be submitted to the Department within twenty (20) calendar days of receipt of this Order and Notice unless you request a hearing in accordance with the provisions of Paragraph 5 below. Payment must be made to the Department at the address listed in Paragraph E of Attachment I.

- 5. Pursuant to N.J.S.A. 26:2C-14.1 you are entitled to a hearing if aggrieved by this Order and Notice. Application for such a hearing must be received by the Department within twenty (20) calendar days from receipt of this Order and Notice. In applying for such hearing, you must furnish the Department with the information listed in Paragraph A of Attachment I. If no request for a hearing is received within twenty (20) calendar days, this Notice shall become a final Order and the Penalty will then become due and payable. A hearing request does not stay the terms or effect of this Order.
- 6. The provisions of this Order and Notice shall be binding on you, your principals, agents, employees, successors, assigns, tenants and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 7. No obligations imposed by this Order and Notice, with the exception of Paragraph 4, are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety and welfare.
- 8. NOTICE IS GIVEN, that pursuant to N.J.S.A. 26:2C-19(b) and N.J.S.A. 26:2C-19(d), any person who violates the provisions of the Act, or any code, rule regulation or order promulgated or issued pursuant thereto, or who fails to pay a civil administrative penalty in full, shall be liable to a penalty of up to \$10,000 for the first offense, \$25,000 for the second offense, and \$50,000 for the third and each subsequent offense.

Dated: June 7, 1989

Donald F. Patterson, Assistant Director

Environmental Enforcement

CERTIFIED MAIL



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION **DIVISION OF ENVIRONMENTAL QUALITY** CN 027, **TRENTON, NJ 08625**



IN THE MATTER OF

ADMINISTRATIVE ORDER AND

ARSYNCO INC.

NOTICE OF CIVIL ADMINISTRATIVE

FT OF 13TH ST. CARLSTADT, N.J. 07072 LOG #A891482 MRA, CDS

PENALTY ASSESSMENT

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:1D-1 et seq., and the Air Pollution Control Act, N.J.S.A. 26:20-I et seq. (the "Act"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

- As the result of an investigation conducted on April 19, 1989, the Department has determined that at your facility located at Ft. of 13th St., Borough of Carlstadt, Lot(s) 1E, Block(s) 146, County of Bergen, State of New Jersey, (ID #00098) you used the equipment and/or control apparatus associated with Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit") and Certificate(s) to Operate Control Apparatus or Equipment ("Certificate") without fulfilling all conditions and provisions of the Permit(s) and Certificate(s) #See below, in violation of N.J.A.C. 7:27-8.3(e)1 by
 - P/CT #68134 Installing reactor S-242 and venting it to the scrubber covered by the above Permit/Certificate.
 - P/CT #82903 Installing reactor R-3 and venting it to the scrubber covered by the above Permit/Certificate.
 - (c) P/CT #81339 Installing a 200 gallon and a 500 gallon mineral oil Tanks and venting them to the stack covered by the above Permit/ Certificate.

ORDER

- NOW, THEREFORE, IT IS HEREBY ORDERED THAT on or before July 7, 1989, you 2. cease operation of the equipment listed in Paragraph 1 above or operate said equipment in accordance with the above Permit(s) and Certificate(s) or submit the required Permit and Certificate application(s) VEM-003 and VEM-004 to the Bureau of New Source Review to obtain a Permit(s) and Certificate(s) for said equipment.
- IT IS FURTHER ORDERED THAT, if you submit the required Permit and 3. Certificate application(s) for said equipment, then, on or before October 7, 1989, you obtain an approved Permit(s) and Certificate(s). required Permit(s) and Certificate(s) is not obtained by the above date, you must cease installation/operation of the equipment listed in Paragraph I above.

PENALTY

- 4. Based upon the above FINDINGS, and a review of the entire matter, the Department hereby assesses a Civil Administrative Penalty against you in the amount of \$2,400.00. Payment must be submitted to the Department within twenty (20) calendar days of receipt of this Order and Notice unless you request a hearing in accordance with the provisions of Paragraph 5 below. Payment must be made to the Department at the address listed in Paragraph E of Attachment I.
- 5. Pursuant to N.J.S.A. 26:2C-14.1 you are entitled to a hearing if aggrieved by this Order and Notice. Application for such a hearing must be received by the Department within twenty (20) calendar days from receipt of this Order and Notice. In applying for such hearing, you must furnish the Department with the information listed in Paragraph A of Attachment I. If no request for a hearing is received within twenty (20) calendar days, this Notice shall become a final Order and the Penalty will then become due and payable. A hearing request does not stay the terms or effect of this Order.
- 6. The provisions of this Order and Notice shall be binding on you, your principals, agents, employees, successors, assigns, tenants and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 7. No obligations imposed by this Order and Notice, with the exception of Paragraph 4, are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety and welfare.
- 8. NOTICE IS GIVEN, that pursuant to N.J.S.A. 26:2C-19(b) and N.J.S.A. 26:2C-19(d), any person who violates the provisions of the Act, or any code, rule regulation or order promulgated or issued pursuant thereto, or who fails to pay a civil administrative penalty in full, shall be liable to a penalty of up to \$10,000 for the first offense, \$25,000 for the second offense, and \$50,000 for the third and each subsequent offense.

Dated: June 7, 1989

Donald F. Patterson, Assistant Director

Environmental Enforcement

CERTIFIED MAIL

AIR ATTACHMENT I

- A. In order to request an adjudicatory hearing, the applicant shall furnish the Department with the following information at the time of the request:
 - 1. The name, address, and telephone number of the applicant and its authorized representative;
 - 2. The applicant's defenses to each of the findings of fact stated in short and plain terms;
 - 3. An admission or denial of each of the findings of fact. If the applicant is without knowledge or information sufficient to form a belief as to the truth of a finding, the applicant shall so state and this shall have the effect of a denial. A denial shall fairly meet the substance of the findings denied. When the applicant intends in good faith to deny only a part of a qualification of a finding, the applicant shall specify so much of it as is true and material and deny only the remainder. The applicant may not generally deny all of the findings but shall make all denials as specific denials of designated findings. For each finding the applicant denies, the applicant shall allege the fact or facts as the applicant believes it or them to be:
 - 4. Information supporting the request and copies of other written documents relied upon to support the request;
 - 5. An estimate of the time required for the hearing (in days and/or hours); and
 - 6. A request, if necessary, for a barrier-free hearing location for the handicapped.
- B. If the Department does not receive the hearing request within 20 days after receipt by the applicant of the Administrative Order and/or the Notice of a Civil Administrative Penalty Assessment being challenged, the Department shall deny the hearing request.
- C. If the applicant fails to include all the information required by Paragraph A above, the Department may deny the hearing request.
- D. All adjudicatory hearings held pursuant to this request shall be conducted in accordance with the Administrative Procedures Act, N.J.S.A. 52:14B-1 et seq. and the Uniform Administrative Procedure Rules, N.J.A.C. 1:1-1.1 et seq.
- E. Any submission of information required by the attached Administrative Order and Notice shall be made to:

Donald F. Patterson, Assistant Director Environmental Enforcement Department of Environmental Protection CN 027 Trenton, New Jersey 08625

F. If there are any questions concerning this Administrative Order and Notice, please contact Mr. Earnest H. Greene, Supervisor, Bureau of Enforcement Services, at (609) 633-1130.



Anthony J. McMahon Acting Director

State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY

CN 027 Trenton, N.J. 08625-0027

(609) 633-7288 Fax #: (609) 984-9658



Donald F. Patterson, Assistant Director Environmental Enforcement

July 17, 1990

Mr. Gary Danis Arsynco Company, Inc. Foot of 13th Street Carlstadt, New Jersey 07072

Re: New Jersey Administrative Code 7:27-8.3(a)
Administrative Order and Notice of Civil
Administrative Penalty Assessment with Log #A891483 MRA, CDS
dated June 7, 1989 - \$400.00

Dear Mr. Danis:

This is in response to your letter dated July 3, 1989 and your subsequent telephone conversation of May 11, 1990 with Mr. Todd Boyer, of my staff, concerning the referenced Administrative Order.

As the result of an investigation conducted on April 19, 1989, the Department has determined that Arsynco Company, Inc. constructed, installed or altered an exhaust system venting a propylene filling line without obtaining the required Permit to Construct, Install or Alter Control Apparatus or Equipment in violation of N.J.A.C. 7:27-8.3(a). After further review, the Department has determined that the referenced Administrative Order was issued in error. This decision is based on the fact that the equipment cited in the referenced Administrative Order, as currently operated, does not fall under the provisions of N.J.A.C. 7:27-8.1 et seq. Specifically, the equipment cited was installed prior to the effective date of the regulation and is therefore considered grandfathered.

Accordingly, the referenced Administrative Order and Notice of Civil Administrative Penalty Assessment are hereby rescinded, effective immediately, and the \$400.00 penalty assessment need not be remitted.

Mr. Gary Danis July 17, 1990 Page 2

If you have any further questions concerning this matter, please contact Mr. Earnest H. Greene at (609) 633-1130.

Sincerely,

Harold E. Christiff, Chief Bureau of Enforcement Services

HEC/TE/jt

c: E. Greene

M. Makler

A. Bara

T. Boyer

B. Sullivan (MRO)



()irector

Jorge H. Berkowitz, Ph.D.

The second second

Rec, 10/18/89

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY CN 027, TRENTON, NJ 08625



Anthony J. McMahon, Assistant Dure to Environmental Enforcement

an might grante and

1 Back The

IN THE MATTER OF ARSYNCO COMPANY INC. FOOT OF 13TH STREET CARLSTADT, NJ 07072 LOG #A892304 MRA CDS ADMINISTRATIVE ORDER AND

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:1D-1 et seq., and the Air Pollution Control Act, N.J.S.A. 26:2C-1 et seq. (the "Act"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

As the result of an investigation conducted on July 13, 1989, the Department has determined that at your facility located at Foot of 13th Street, Borough of Carlstadt, Lot(s) 1E, Block(s) 146, County of Bergen, State of New Jersey, (ID #00098), you used the equipment and/or control apparatus associated with Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit") and Certificate(s) to Operate Control Apparatus or Equipment ("Certificate") without fulfilling all conditions and provisions of the Permit(s) and Certificate(s) #See below, in violation of N.J.A.C. 7:27-8.3(e)1 by operating the following tanks containing Volatile Organic Substances which are exposed to the rays of the sun and whose surfaces have not been painted and maintained white:

P/CT#	Material Stored
49259	recovered solvents
49260	mono methy amine
49266	xylene
49268	methanol
49269	methyl acetate
49279	xylene
49281	xylene
	49259 49260 49266 49268 49269 49279

ORDER

NOW, THEREFORE, IT IS HERERY ORDERED THAT on or before, November 10, 1989, you cease operation of the equipment listed in Paragraph 1 above or operate said equipment in accordance with the above Permit(s) and Certificate(s).

PENALTY

Based upon the above FINDINGS, and a review of the entire matter, the Department hereby assesses a Civil Administrative Penalty against you in the amount of \$ 14,000.00. Payment must be submitted to the Department within twenty (20) calendar days of receipt of this Order and Notice unless you request a hearing in accordance with the provisions of Paragraph 4 below. Payment must be made to the Department at the address listed in Paragraph E of Attachment I.

ARSYNCO COMPANY INC. A892304 PAGE 2

GENERAL PROVISIONS

- 4. Pursuant to N.J.S.A. 26:2C-14.1 you are entitled to a hearing if aggrieved by this Order and Notice. Application for such a hearing must be received by the Department within twenty (20) calendar days from receipt of this Order and Notice. In applying for such hearing, you must furnish the Department with the information listed in Paragraph A of Attachment I. If no request for a hearing is received within twenty (20) calendar days, this Notice shall become a final Order and the Penalty will then become due and payable. A hearing request does not stay the terms or effect of this Order.
- 5. The provisions of this Order and Notice shall be binding on you, your principals, agents, employees, successors, assigns, tenants and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- No obligations imposed by this Order and Notice, with the exception of Paragraph 3, are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety and welfare.
- 7. NOTICE IS GIVEN, that pursuant to N.J.S.A. 26:20-19(b) and N.J.S.A. 26:20-19(d), any person who violates the provisions of the Act, or any code, rule regulation or order promulgated or issued pursuant thereto, or who fails to pay a civil administrative penalty in full, shall be liable to a penalty of not more than \$10,000 for the first offense, not more than \$25,000 for the second offense, and not more than \$50,000 for the third and each subsequent offense.

Dated: October 11, 1989

Donald F. Patterson, Assistant Director

Environmental Enforcement

CERTIFIED MAIL



Director

esps, JF, GD?

Rec. 10/118/89

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY CN 027, TRENTON, NJ 08625



AND THE STATE OF T

Anthony J. McMahon, Assistant Drive Environmental Enforcement

THE STATE OF THE S

ADMINISTRATIVE ORDER AND

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

IN THE MATTER OF ARSYNCO COMPANY, INC. FOOT OF 13TH STREET CARLSTADT, NJ 07072 LOG #A892305 MRA CDS

THE PARTY OF THE REST

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:1D-1 et seq., and the Air Pollution Control Act, N.J.S.A. 26:2C-1 et seq. (the "Act"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

As the result of an investigation conducted on July 13, 1989, the Department has determined that at your facility located at Foot of 13th Street, Borough of Carlstadt, Lot(s) 1E, Block(s) 146, County of Bergen, State of New Jersey, (ID #00098), you permitted the storage of a Volatile Organic Substance(s) in a storage tank(s), listed below, having a capacity greater than 2000 gallons (5,750 liters) which is exposed to the rays of the sun and is not painted white, in violation of N.J.A.C. 7:27-16.2(a)1:

Tank #70 containing toluene.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED THAT on or before November 10, 1989, you paint and maintain the tank(s), listed in Paragraph 1 above, white.

PENALTY

Based upon the above FINDINGS, and a review of the entire matter, the Department hereby assesses a Civil Administrative Penalty against you in the amount of \$200.00. Payment must be submitted to the Department within twenty (20) calendar days of receipt of this Order and Notice unless you request a hearing in accordance with the provisions of paragraph 4 below. Payment must be made to the Department at the address listed in Paragraph E of Attachment I.

GENERAL PROVISIONS

- Pursuant to N.J.S.A. 26:20-14.1 you are entitled to a hearing if aggrieved 4. by this Order and Notice. Application for such a heaving must be received by the Department within twenty (20) calcular days from receipt of this Order and Notice. In applying for such hearing, you must furnish the Department with the information listed in Paragraph Λ of Attachment I. If ... no request for a hearing is received within twenty (20) calendar days, this Notice shall become a final Order and the Penalty will then become due and payable. A hearing request does not stay the terms or effect of this Order.
- The provisions of this Order and Notice shall be binding on you, your principals, agents, employees, successors, assigns, tenants and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- No obligations imposed by this Order and Notice, with the exception of Paragraph 3, are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy 6. proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety and welfare.
- 26:20-19(b) and N.J.S.A. NOTICE IS GIVEN, that pursuant to N.J.S.A. 26:20-19(d), any person who violates the provisions of the Act, or any code, rule regulation or order promulgated or issued pursuant thereto, or who fails to pay a civil administrative penalty in full, shall be liable to a penalty of not more than \$10,000 for the first offense, not more than \$25,000 for the second offense, and not more than \$50,000 for the third and each subsequent offense.

Dated: October 11, 1989

Assistant Director Patterson,

Environmental Enforcement

CERTIFIED MAIL



Jorge H. Berkowitz, Ph.D. Furector

Pec: 10/18/29

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY CN 027, TRENTON, NJ 08625



Arithony J. McMahon, Assistant Dure to Environmental Enforcement

1

IN THE MATTER OF ARSYNCO COMPANY, INC. FOOT OF 13TH STREET CARLSTADT, NJ 07072 LOG #A892306 MRA CDS ADMINISTRATIVE ORDER AND

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:1D-1 et seq., and the Air Pollution Control Act, N.J.S.A. 26:2C-1 et seq. (the "Act"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

As the result of an investigation conducted on July 13, 1989, the Department has determined that at your facility located at Foot of 13th Street, Borough of Carlstadt, Lot(s) 1E, Block(s) 146, County of Bergen, State of New Jersey, (ID #00098), you used the equipment and/or control apparatus associated with Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit") and Certificate(s) to Operate Control Apparatus or Equipment ("Certificate") without fulfilling all conditions and provisions of the Permit(s) and Certificate(s) #49256, in violation of N.J.A.C. 7:27-8.3(e)1 by changing the contents of tank #70 from #6 fuel oil to toluene.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED THAT on or before November 10, 1989, you cease operation of the equipment listed in Paragraph 1 above or operate said equipment in accordance with the above Permit(s) and Certificate(s) or submit the required Permit and Certificate application(s) VEM-003 and VEM-004 to the Bureau of New Source Review to obtain a Permit(s) and Certificate(s) for said equipment.

IT IS FURTHER ORDERED THAT, if you submit the required Permit and Certificate application(s) for said equipment, then, on or before February 8, 1990, you obtain an approved Permit(s) and Certificate(s). If the required Fermit(s) and Certificate(s) is not obtained by the above date, you must cease installation/operation of the equipment listed in Paragraph 1 above.

ARSYNCO COMPANY, INC. A892306 PAGE 2

PENALTY

4. Based upon the above FINDINGS, and a review of the entire matter, the Department hereby assesses a Civil Administrative Penalty against you in the amount of \$2,000.00. Payment must be submitted to the Department within twenty (20) calendar days of receipt of this Order and Notice unless you request a hearing in accordance with the provisions of Paragraph 5 below. Payment must be made to the Department at the address listed in Paragraph E of Attachment I.

GENERAL PROVISIONS

- 5. Pursuant to N.J.S.A. 26:20-14.1 you are entitled to a hearing if aggrieved by this Order and Notice. Application for such a hearing must be received by the Department within twenty (20) calendar days from receipt of this Order and Notice. In applying for such hearing, you must furnish the Department with the information listed in Paragraph A of Machinent I. If no request for a hearing is received within twenty (20) calendar days, this Notice shall become a final Order and the Penalty will then become due and payable. A hearing request does not stay the terms or effect of this Order.
- 6. The provisions of this Order and Notice shall be binding on you, your principals, agents, employees, successors, assigns, tenants and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 7. No obligations imposed by this Order and Notice, with the exception of Paragraph 4, are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety and welfare.
 - NOTICE IS GIVEN, that pursuant to N.J.S.A. 26:2C-19(b) and N.J.S.A. 26:2C-19(d), any person who violates the provisions of the Act, or any code, rule regulation or order promulgated or issued pursuant thereto, or who fails to pay a civil administrative penalty in full, shall be liable to a penalty of up to \$10,000 for the first offense, \$25,000 for the second offense, and \$50,000 for the third and each subsequent offense.

Dated: October 11, 1989

Donald F. Patterson, Assistant Director

Environmental Enforcement

CERTIFIED MAIL



Jorge H. Barkowitz, Ph.O. Director

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY CN 027, TRENTON, NJ 08625



Anthony J. McManon. Assistant Director Environmental Enforcement

IN THE MATTER OF ARSYNCO, INC. FOOT OF 13TH STREET CARLSTADT, NJ 07072 LOG #A900079 MRA, CDS

ADMINISTRATIVE ORDER AND

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:1D-1 et seq., and the Air Pollution Control Act. N.J.S.A. 26:2C-1 et seq. (the "Act"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

1. As the result of an investigation conducted on Hovember 20, 1989, the Department has determined that at your facility located at Foot of 13th Street, Borough of Carlstadt. Lot(s) 12. Block(s) 145, County of Bergen. State of New Jersey. (ID #00098), you used the equipment and/or control apparatus associated with Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit") and Certificate(s) to Operate Control Apparatus or Equipment ("Certificate") without fulfilling all conditions and provisions of the Permit(s) and Certificate(s) #48667, in violation of N.J.A.C. 7:27-8.)(e)) by manufacturing orange dye in reactor 249A. This reactor is permitted for the production of Chiorazol acid chloride only.

ORDER

- 2. NOW, THEREFORE, IT IS HEREBY ORDERED THAT on or before February 9, 1990. you cease operation of the equipment listed in Paragraph 1 above or operate said equipment in accordance with the above Permit(s) and Certificate(s) or submit the required Permit and Certificate application(s) VEM-003 and VEM-004 to the Bureau of New Source Review to obtain a Permit(s) and Certificate(s) for said equipment.
- IT IS FURTHER ORDERED THAT, if you submit the required Permit and Certificate application(s) for said equipment, then, on or before May 10, 1990, you obtain an approved Permit(s) and Certificate(s). If the required Permit(s) and Certificate(s) is not obtained by the above date, you must cease installation/operation of the equipment listed in Paragraph 1 above.



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY

CN 027, **TRENTON, NJ 08625**



Donald F. Patterson, Assistant Director Environmental Enforcement

Director

IN THE MATTER OF ARSYNCO, INC. FOOT OF 13TH STREET CARLSTADT, NJ 07072 LOG #A902299 MRA, CDS ADMINISTRATIVE ORDER AND

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S. $\hat{\mathbf{A}}$. 13:1D-1 et seq., and the $\hat{\mathbf{A}}$ ir Pollution Control Act, 26:20-1 et seq. (the "Act"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

1. As the result of an investigation conducted on October 25, 1990, the Department has determined that at your facility located at Foot of 13th Street, Borough of Carlstadt, Lot(s) 1, Block(s) 91, County of Bergen, State of New Jersey, (ID #00098), you constructed, installed, or altered the following equipment without obtaining the required Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit"), in violation of N.J.A.C. 7:27-8.3(a):

Two individually vented crystallizer vessels with condensers.

ORDER

- 2. NOW, THEREFORE, IT IS HEREBY ORDERED THAT on or before January 10, 1991, you submit the required Permit and Certificate to Operate Control Apparatus or Equipment ("Certificate") application(s) VEM-003 and VEM-004 to the Bureau of New Source Review to obtain a Permit(s) and Certificate(s) for the equipment listed in Paragraph I above. If the required Permit and Certificate application(s) is not submitted by the above date, you must cease installation/operation of such equipment.
- 3. IT IS FURTHER ORDERED THAT on or before April 10, 1991, you obtain an approved Permit(s) and Certificate(s). If the required Permit and Certificate is not obtained by the above date, you must cease installation/operation of the equipment listed in Paragraph 1 above.

PENALTY

4. Based upon the above FINDINGS, and a review of the entire matter, the Department hereby assesses a Civil Administrative Penalty against you in the amount of § 400.00. Payment must be submitted to the Department within twenty (20) calendar days of receipt of this Order and Notice unless you request a hearing in accordance with the provisions of Paragraph 5 below. Payment must be made to the Department at the address listed in Paragraph A of Attachment I.

GENERAL PROVISIONS

- 5. Pursuant to N.J.S.A. 26:20-14.1 you are entitled to a hearing if aggrieved by this Order and Notice. Application for such a hearing must be received by the Department within twenty (20) calendar days from receipt of this Order and Notice. In applying for such hearing, you must furnish the Department with the information listed in Paragraph C of Attachment I. If no request for a hearing is received within twenty (20) calendar days, this Notice shall become a final Order and the Penalty will then become due and payable. A hearing request does not stay the terms or effect of this Order.
- 6. The provisions of this Order and Notice shall be binding on you, your principals, agents, employees, successors, assigns, tenants and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 7. No obligations imposed by this Order and Notice, with the exception of Paragraph 4, are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety and welfare.
- 8. Pursuant to N.J.S.A. 26:20-19 and N.J.A.C. 7:27A-3.12, the Department may, in addition to any civil administrative penalty assessed, amend such penalty assessment to include a civil administrative penalty for the economic benefit (in dollars) which a violator has realized as a result of not complying, or by delaying compliance with this Act.
- 9. Pursuant to N.J.S.A. 26:20-19(b) and N.J.S.A. 26:20-19(d), any person who violates the provisions of the Act, or any code, rule regulation or order promulgated or issued pursuant thereto, or who fails to pay a civil administrative penalty in full, shall be liable to a penalty of up to \$10,000 for the first offense. \$25,000 for the second offense, and \$50,000 for the third and each subsequent offense.
- 10. Pursuant to N.J.S.A. 26:20-19(f)1 any person who purposely or knowingly violates the provisions of the Act, or any code, rule, regulation, administrative order or court order promulgated or issued pursuant thereto, is guilty of a crime of the third degree.

ARSYNCO, INC. A902299 PAGE 3

11. Pursuant to N.J.S.A 26:2C-19(f)2 any person who recklessly violates the provisions of the Act, or any code, rule, regulation, administrative order or court order promulgated or issued pursuant thereto, is guilty of a crime of the fourth degree.

Dated: December 11, 1990

Donald F. Patterson, Assistant Director

Environmental Enforcement

CERTIFIED MAIL

AIR POLLUTION CONTROL - ATTACEMENT I

Penalty Payment .

A. Remit penalty payment with the enclosed Enforcement Invoice (white form) to:

New Jersey Department of Environmental Protection Bureau of Revenue CN - 402 Trenton, New Jersey 08625-0402

Adjudicatory Rearing and/or Information Submission

B. An adjudicatory hearing request and/or any submission of information required by the enclosed Administrative Order and/or Notice of Civil Administrative Penalty Assessment shall contain the log number of the Order and must be sent to:

Donald F. Patterson, Assistant Director Environmental Enforcement Department of Environmental Protection . CN-027 Trenton, New Jersey 08625-0027

Adjudicatory Rearing Request Procedure

- C. In order to request an adjudicatory hearing to contest an Administrative Order and/or a Notice of Civil Administrative Penalty Assessment issued pursuant to the Act and pursuant to N.J.A.C. 7:27A-3.4(a), the applicant shall submit the following information in writing to the Department:
 - 1. The name, address and telephone number of the applicant and its authorized representative;
 - 2. The applicant's defenses to each of the Department's findings of fact in the Administrative Order and Notice of Civil Administrative Penalty Assessment stated in short and plain terms;
 - 3. An admission or denial of each of the Department's findings of fact in the Administrative Order and Notice of Civil Administrative Penalty Assessment. If the applicant is without knowledge or information sufficient to form a belief as to the truth of a finding, the applicant shall so state and this shall have the effect of a denial. A denial shall fairly meet the substance of the findings denied. When the applicant intends in good faith to deny only a part

or a qualification of a finding, the applicant shall specify so much of it as is true and material and deny only the remainder. The applicant many not generally deny all of the findings but shall make all denials as specific denials of designated findings. For each finding the applicant denies, the applicant shall allege the fact or facts as the applicant believes it or them to be;

- 4. Information supporting the request and specific reference to or copies of other written documents relied upon to support the request;
- 5. An estimate of the time required for the hearing (in days and/or hours); and
- 6. A request, if necessary, for a barrier-free hearing location for physically disabled persons.
- D. Pursuant to N.J.A.C. 7:27A-3.4(b), if the Department does not receive a written hearing request within 20 days after receipt by the applicant of the Administrative Order and/or the Notice of Civil Administrative Penalty Assessment being challenged, the Department shall deny the hearing request.
- E. Pursuant to N.J.A.C. 7:27A-3.4(c), if the applicant fails to include all the information required by Paragraph C above, the Department may deny the hearing request.
- F. All adjudicatory hearings held pursuant to this request shall be conducted in accordance with the Administrative Procedure Act, N.J.S.A. 52:148-1 et seq. and the Uniform Administrative Procedure Rules N.J.A.C 1:1-1.1 et seq.

Further Ovestions or Clarification

G. If there any questions concerning this Administrative Order and/or Notice, please contact Mr. Earnest H. Greene, Supervisor, Bureau of Enforcement Services, at (609) 633-1130.

P-062A 1/89	62A N.J. DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY ENFORCEMENT INVOICE			DOC # DATE RECD	
TE	PROGRAM ID #	PROGRAM	DESCRIPTION	DATE DUÉ	AMOUNT DUE
/11/90	A902299	ΛIR	8.3(a)	1/10/91	\$400.00

TYPE OF REVISED BILLING

, NJ

07072

ASYNCO, INC.

RLSTADT

OOT OF 13TH STREET

MAKE CHECK PAYABLE TO: TREASURER, STATE OF NEW JERSEY

RETURN THIS WHITE FORM WITH PAYMENT TO:
NJDEP - BUREAU OF REVENUE
CN 402, TRENTON, NJ 08625-0402

VE COPY 2 (YELLOW) FOR YOUR RECORDS -- FAILURE TO RETURN THIS FORM WITH PAYMENT
MAY RESULT IN ACCOUNT NOT BEING CREDITED

Received 5/19/92 910



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY DIVISION OF FACILITY WIDE ENFORCEMENT CN 027, TRENTON, NJ 08625-0027

÷



IN THE MATTER OF ARSYNCO, INC. P.O. BOX 8 CARLSTADT, NJ 07072

ADMINISTRATIVE ORDER AND

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection and Energy (the "Department") by N.J.S.A. 13:1D-1 et seq., and the Air Pollution Control Act, N.J.S.A. 26:2C-1 et seq. (the "Act"), and duly delegated to the Assistant Director, Air and Environmental Quality Enforcement, the Division of Facility Wide Enforcement pursuant to N.J.S.A. 13:1B-4.

FINDINGS

- 1. As the result of an investigation conducted on March 31, 1992, the Department has determined that at your facility located at Foot of 13th Street, Boro of Carlstadt, Lot(s) 1, Block(s) 91, County of Bergen, State of New Jersey, (ID #00098), you constructed, installed, or altered the following equipment without obtaining the required Permit(s) to Construct; Install or Alter Control Apparatus or Equipment ("Permit"), in violation of N.J.A.C. 7:27-8.3(s):
 - a. A local exhaust system was installed to vent stills S-139, S-140 and S-246 which are located in building #19.
 - b. A local exhaust system was installed to vent four reactors and four feed pumps located in building #1.
 - c. A local exhaust system was installed to vent reactors S-9 and S-15 = and receiver R-15 located in building #1.

CRDER

- 2. NOW, THEREFORE, IT IS HEREBY ORDERED THAT on or before June 15, 1992, you submit the required Permit and Certificate to Operate Control Apparatus or Equipment ("Certificate") application(s) VEM-003 and VEM-004 to the Bureau of New Source Review to obtain a Permit(s) and Certificate(s) for the equipment listed in Paragraph 1 above. If the required Permit and Certificate application(s) is not submitted by the above date, you must cease installation/operation of such equipment.
- 3. IT IS FURTHER ORDERED THAT on or before September 14, 1992, you obtain an approved Permit(s) and Certificate(s). If the required Permit and Certificate is not obtained by the above date, you must cease installation/operation of the equipment listed in Paragraph 1 above.

ADSCARS DAGE S

أفيس لأأم ماميثة فيم

1. Rused apara the above TITTIVOS, sells serview of the estimation, the Deport sells is by a serve a district of inferture for ITD and ITD And ITD And ITD AND ITD

SKOTCH CONTRACTS

- Parament to N.I.S.A. 26:25-15.1 [so are extitled to an adjudicatory tracing off aggrees of by the Dade. and Matice. (Written application for eigh a be stage out to be a six of the the Department within twelf. (20) that, stage for a six of the Dade. The Department within twelf. (20) that, stage for a six of a six of the Dade with the late of a line of the Dade of t
 - . The provisions of this Only of Tation shift to this log on you, you principally, grains engineer, we cossors, assigns, transits and any trustee in bulkingty of the color of specialed personed to a proceeding in the or equity.
- The obligations is posed by this Code and Notice, with the exception of Paragraph is diverged to constitute a debt, datage claim, penalty or other civit action which should be indicated as discharged in a backuptey proceeding. All obligations is pessed by this Order shall constitute continuing regulatory daligations lapaced personal to the police powers of the State of New Teleopy, introducing protect the public health, safety and welfare.
- Tresument to N. 1.8.A. 26.26-10 med N. 1.A.C. 7:27A-3.12, the Deportment say, to indition to any civil of indit, tive penalty assessed, about such position assessed on include to ivil administrative penalty for the latter to expect to include the violator has vestized as a result of the equilibrium of a positive to the same vestions.
 - The property of the following of the first of the first of the second of the first

ADOMMON, TYÓ. ADOMAN DAOMAN

TO. Prosecut in T.1,8.3. Of Orwins? The Police who proved you knowledly stated the provincial of the Control of the Police of th

The square to Mille, A restriction is the provided of the first term the provided of the first of the provided of the first of the problem of the restrict of the provided of the problem of the restrict of the provided of the problem of the restrict of the problem of the problem.

way we an ango

Donald & Pallerin

and the following that fundity factors as



State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY

New Jersey Administrative Code 7:27-8.3 (a) & (b)

Permits and Certificates Penalty Calculation Sheet 3-31-92 Date of Violation: Name of Violator: Equipment: Air Contaminant: N.J.A.C 7:27-8.3(a) N.J.A.C 7:27-8.3(b) f of sources # of sources ... 3 Less than 10 lbs/hr Less than 10 lbs/hr 10 lbs/hr to 22.8 lbs/hr 10 lbs/hr to 22.8 lbs/hr ___Greater than 22.8 lbs/hr Greater than 22.8 lbs/hr NSPS, NESHAPS, PSDAQ, MSPS, NESHAPS, PSDAQ, EOR, EHS and TYOS EOR, EHS and TVOS Signature of Investigators from Comill For completion by BES: Offense Number: Pursuant to N.J.A.C. 7:27A-3.10 N.J.A.C 7:27-8.3(a) J Less than 10 lbs/hr x \$3000 10 lbs/hr to 22.8 lbs/hr x \$ Greater than 22.8 lbs/hr x \$ NSPS, NESHAPS PSDAG EOR. EHS and TVOS N.J.A.C 7:27-8.3(b) f of sources Penalty Less than 10 lbs/hr __10 lbs/hr to 22.8 lbs/hr X Greater than 22.8 lbs/hr X

Total Penalty Assessment \$ 9000 Signature of Assessor: whe c. healt

_NSPS, NESHAPS, PSDAQ, EOR, EHS, and TVOS

CC, Xls g. Fecon



State of New Jersey Department of Environmental Protection and Energy Enforcement

Received 2/4/93

Scott A. Weiner Commissioner

Diane K. Weeks Assistant Commissioner

January 28, 1993

Mr. James P. Dillion
Vice President Environmental
and Regulatory Affairs Manager
Arsynco Corporation
P.O. Box 8
Carlstadt, New Jersey 07072

Re: Arsynco Corporation - Carlstadt

- Item (1) New Jersey Administrative Code 7:27-8.3(a)
 Administrative Order and Notice of Civil
 Administrative Penalty Assessment with
 Log #A902299 MRA, CDS dated December 11, 1990
 - (2) New Jersey Administrative Code 7:27-8.3(a)
 Administrative Order and Notice of Civil
 Administrative Penalty Assessment with
 Log #A920460 MRA, CDS dated December 16, 1992

1990 RS # 19

1990 RS # 19

5-139, S-140, S 246

5-139, S-140, S 246

4 purps

1992 c) 6841 - S-9, S-15, A

Dear Mr. Dillion:

This is in response to your letters dated December 27, 1990, June 9, 1992 and to confirm the telephone conversation and agreement reached on January 15, 1993 with Mr. Lyle Davis of my staff, concerning the referenced Administrative Orders and Notices.

The Department has reviewed the referenced Administrative Orders and related documents and has determined the following:

Item #1:

As the result of an investigation conducted on October 25, 1990, the Department determined that Arsynco Corporation ("Corporation") was in violation of New Jersey Administrative Code 7:27-8.3(a). Therefore, on December 11, 1990, the Department issued the referenced Administrative Order and Notice in the amount of \$400.00.

Mr. James P. Dillion Page 2

Item #2:

As the result of an investigation conducted on March 31, 1992, the Department determined that the Corporation was in violation of New Jersey Administrative Code 7:27-8.3(a). Therefore, on December 16, 1992, the Department issued the referenced Amended Administrative Order and Notice in the amount of \$1,200.00.

In an effort to amicably resolve this matter, the Department will accept \$900.00 as full payment of the combined \$1,600.00 assessed penalty. The Corporation agreed to pay the \$900.00 assessed penalty on or before February 22, 1993. Please make check payable to Treasurer, State of New Jersey and remit payment with the enclosed invoices to the Bureau of Revenue at the address stated on the invoices.

If you no longer wish to pursue an adjudicatory hearing, please execute and submit the enclosed Authorization, by February 22, 1993.

The Department hereby extends the referenced Administrative Orders until April 23, 1993. This extension should provide sufficent time for the Corporation to submit an application and obtain an approved Permit to Construct and Certificate to Operate for the equipment stated in the referenced Administrative Orders.

If you should have any further questions concerning this matter, please contact Mr. Lyle Davis, of my staff, at (609) 984-9483.

Sincerely,

Harold E. Christiff, Chief

Bureau of Enforcement Services

HEC:LD:ow ENCLOSURE

c: M. Osvai

L. Davis

M. Makler

B. Sullivan (MRO)

T. Cosmos (DAG)



P.O Box 8 • Caristadt, N.J. 07072 201 • 933 • 2323

February 18th, 1993

Harold E. Christiff, Chief NJ Dept of Envir. Protection & Energy Bureau of Enforcement Services CN 422 Trenton, New Jersey 08625-0422

RE: A.O. LOG #A902299 MRA, CDS dated 12/11/90

A.O. Log #A920460 MRA, CDS dated 12/16/92

Dear Mr. Christiff:

Arsynco Inc. agrees to amicably resolve the above referenced Administrative Orders and pay \$900.00 as full payment of the combined \$1,600.00 assessed penalty. As directed in your letter dated 1/23/93, I have sent payment to the Treasurer State of New Jersey. I have also completed the authorization statement and withdrawn the request for a adjudicatory hearing as directed in your letter.

Payment of these penalties shall not be deemed as an admission of guilt by Arsynco Inc. for either of these alleged violations; nor is it an admission that Arsynco Inc. is liable for any civil or administration penalties and/or additional cost incurred by the department or any other responsibilities or obligations relating to these alleged violations.

Thank you and your associates for assistance in settling this matter.

Sincerely,

James P. Dillon

pros fellon-

V.P./Environmental & Regulatory Affairs Manager

ND

cc: D. Space

P. Herzberg



State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY CN 027

Trenton, N.J. 08625-0027 (609) 633-1146 Fax # (609) 292-1074

Anthony J. McMahon Acting Director



Richard A. Dime, Ph.D., Assistant Director Release Prevention & Emergency Response

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
October 30,1989

Mr. Dennis Space Arsynco Inc. Foot of 13th St. Carlstadt N.J. 07072

REFERENCE: N.J.A.C. 7:31-2.6 (f) Risk Management Program Consent Agreement for Arsynco Calstadt N.J. TCPA 5005

Dear Mr. Space:

Enclosed is a Draft Consent Agreement prepared by the Department of Environmental Protection ("the Department") pursuant to N.J.A.C. 7:31-2.6 (f) for your facility.

The Draft Consent Agreement is the result of a review of documents and a site inspection conducted on October 26,1989. The Draft Consent Agreement contains the portions of the Risk Management Program ("RMP") which are approvable, the portions of the RMP which are materially deficient, the proposed actions that must be taken to correct the material deficiencies and the proposed time schedule for taking the actions to correct the material deficiencies.

Within 60 days, please sign and return the Consent Agreement or submit your proposals to correct the deficiencies. If the Department does not reach agreement with Arsynco on the measures necessary to correct the deficiencies or omissions in the RMP, the Department shall prepare and send an Administrative Order pursuant to N.J.A.C. 7:31-2.6 (i) integrating the proposed Consent Agreement and advise Arsynco of its rights to an adjudicatory hearing pursuant to N.J.A.C. 7:31-6.3 (b).

The RMP approval date shall be the date the Department signs the returned signed Consent Agreement or the issue date of the Administrative Order.

Please contact M. Wagshul at (609) 984-3693 if you have any questions regarding the Draft Consent Agreement.

Your continued cooperation is appreciated.

Sincerely,

Allan T. Edwards, Chief

Bureau of Release Prevention

TCPA ID # 5005 cc: M. Wagshul

RISK MANAGEMENT PROGRAM CONSENT AGREEMENT

Arsynco Incorporated

The following Consent Agreement is issued pursuant to the authority vested in the Commissioner of the State of New Jersey Department of Environmental Protection ("The Department") by N.J.S.A. 13:1D-1 et seq. and the Toxic Catastrophe Prevention Act N.J.S.A. 13:1K-19 et seq. and duly delegated to the Assistant Director, Release Prevention and Emergency Response Element, Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4 and amendments made thereto.

A Risk Management Program ("RMP") shall, at a minimum, include:

- 1. Safety review of design for new and existing Extraordinarily Hazardous Substances ("EHS") facilities;
- 2. Standard operating procedures;
- 3. Preventive maintenance program;
- 4. Operator training;
- 5. Accident investigation procedures;
- 6. Risk assessments for specific pieces of EHS equipment or operating alternatives;
- 7. Emergency response program;
- 8. Internal or external risk management program audit procedures.

The Department determined by the submission and evaluation of the Summary Risk Management Program Statement ("SRMPS"), acceptance dated November 16,1989, and August 16,1989, that Arsynco has an established RMP. On file with the Department is a description of each Risk Management Program element of Arsynco's policies, standards and procedures for that program element and the persons or positions responsible for ensuring their implementation which was submitted on July 20,1989 further review documents received July 24,1989.

The above RMP element description and the catalog list of documents delineated in Attachment "A" shall represent Arsynco's RMP covering TDI and monomethylamine for the facility located at the foot of 13th st. Carlstadt N.J. The catalog list of documents encompasses the specific requirements of N.J.A.C. 7:31-3.4, 3.5, 5.6, 3.7, 3.8, 3.9, 3.10 and 3.11. All portions of the RMP are approved except for those items identified in Attachment "B" as material deficiencies for which the Department has indicated the required corrective actions and implementation schedule.

Arsynco hereby agrees to take the indicated corrective actions for these material deficiencies and to comply with the schedule as indicated. Arsynco agrees to submit to the Department a progress report, prior to the fifteenth of each month, showing implementation of corrective actions and compliances with the indicated schedule.

This signed Consent Agreement shall represent the approval of Arsynco's RMP for the facility located at the foot of 13th st. Arsynco agrees to comply with all requirements of its approved RMP. Pursuant to N.J.A.C. 7:31-6.4 the Department may assess a civil administrative penalty of not more than \$10,000 for the first offense, not more than \$20,000 for the second offense, and up to \$50,000 for the third and each subsequent offense for each violation of the Toxic Catastrophe Prevention Act and for violations of any rule, Consent Agreement or Administrative Order issued pursuant thereto.

Submissions to the Department should be sent to:

Chief

Bureau of Release Prevention
Division of Environmental Quality
NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
CN-027

Trenton, New Jersey 08625

DATE:	BY:	`	
	TITLE:		
	for Arsynco:		
DATE:	BY:		
	TITLE:		
	for BUREAU OF RELEASE PREVENT	ION	

Attachments: A & B

ATTACHMENT "A"

ARSYNCO, INC. P.O. BOX 8 CARLSTADT, N. J. 07072 201-933-2323

CATALOG LIST OF DOCUMENTATION

Per N.J.A.C. 7:31 - 3.3 (c), (d), (e)

N.J.A.C. 7:31 - 3.3 (c):

1. Process Chemistry and Design Criteria

No formal design criteria exist within Arsynco, Inc. Good engineering practice dictates that process vessels and pipe have a working pressure rating above that called for by a given process and be made of material(s) resistant to corrosion by the chemicals contained (< 15 mils/yr). Vessels are sized so that they run no more than 85% full (after accounting for temperature expansion) unless other, special, considerations prevail. In electrical classification, Arsynco adheres to Group I, Division II, Class C/D, or better, installations unless other, special, considerations prevail.

A. ZK-47 Process

Process chemistry is given as a part of the SRMPS submission. A copy of the SRMPS is in a file held by the Regulatory Affairs Manager.

For this atmospheric pressure, low temperature (55 C) batch reaction system, a glassed steel reactor equipped with agitator and jacket, Schedule 10 and/or 40 piping, and commercially available transfer pumps are used.

B. N-Methyl Acetamide Process

Process chemistry is given as a part of the SRMPS submission. A copy of the SRMPS is in a file held by the Regulatory Affairs Manager.

For this atmospheric pressure, low temperature (55 C), strong acid catalyzed batch reaction system, a stainless steel reactor equipped with agitator and jacket, Schedule 10 and/or 40 piping, and commercially available transfer pumps are used.

2. Facility Inventory of Extraordinarily Hazardous Substances (EHS)

A running inventory of these are maintained by our Shipping/Receiving Dept. An annual inventory is done each June 30th. The last annual inventory showed:

	Reg. Quant.	Inven	Inventory	
EHS 2,4-Toluene	(RO), lbs.	Quant., lbs.	Date	
Di-Isocyanate	100	None	6/30/89	
Mono-Methyl Amine	2300	None	6/30/89	

3. Reports of Hazard Analyses, Risk Assessments, Safety Reviews

Initial hazard analyses, risk assessments and safety reviews are detailed in respective SRMPS submissions. Subsequent studies in these areas, as well as copies of original SRMPS submissions, are maintained in a file held by the Regulatory Affairs Manager.

- 4. Accident Investigation Reports for Accidents at EHS Facilities
 Will be maintained in a file held by the Regulatory Affairs Manager.
- 5. Updated Process Flow and Piping/Instrument Diagrams

These are detailed in respective SRMPS submissions. Copies of original SRMPS submissions are kept in a file held by the Regulatory Affairs Manager.

6. Standard Operating Procedures

These are detailed in respective SRMPS submissions. Copies of original SRMPS submissions are kept in a file held by the Regulatory Affairs Manager.

7. Site-Wide Safety Procedures

These are detailed in respective SRMPS submissions. Copies of original SRMPS submissions are kept in a file held by the Regulatory Affairs Manager.

8. Site-Wide Emergency Response Plan

This is kept in a file held by the Regulatory Affairs Manager. (A copy is enclosed per your letter request of June 26th.)

N.J.A.C. 7:31 - 3.3 (d):

1. Job Classifications and Job Descriptions for EHS Operators

These are detailed in respective SRMPS submissions. Copies of original SRMPS submissions are kept in a file held by the Regulatory Affairs Manager.

2. Description of EHS Operator Training Program and Its Records

These are detailed in respective SRMPS submissions. Subsequent training sessions and their attendance, as well as copies of the original SRMPS submissions, are maintained in a file held by the Regulatory Affairs Manager.

3. Annual Tabulation of EHS Operator Training Sessions and Attendance at Same.

This is kept in a file held by the Regulatory Affairs Manager.

N.J.A.C. 7:31 - 3.3 (e):

1. Topographic Maps

These are kept in a file held by the Regulatory Affairs Manager.

2. Site Plan

This is kept in a file held by the Regulatory Affairs Manager.

- 3. EHS Equipment Specifications (Including P&I)
- No formal design criteria for equipment specification exist within Arsynco, Inc. Generally accepted engineering practice dictates that process vessels and pipe have a working pressure rating above that called for by a given process and be made of material(s) resistant to corrosion by the chemicals contained (< 15 mils/yr). Vessels are sized so that they run no more than 85% full (after accounting for temperature expansion) unless other, special, considerations prevail. In electrical classification, Arsynco adheres to Group I, Division II, Class C/D, or better, installations unless other, special, considerations prevail.

4. National Electrical Code Area Classification Diagrams for EHS Facilities and Adjoining Areas.

These are kept in a file held by the Regulatory Affairs Manager.

5. Electrical One Line Diagrams.

These are kept in a file held by the Regulatory Affairs Manager.

6. Piping Diagrams showing the Fire Water System.

These are kept in a file held by the Regulatory Affairs Manager.

7. Piping Diagrams showing the Sewer System.

These are kept in a file held by the Regulatory Affairs Manager.

8. Criteria for Design and Operation.

No formal design criteria exist within Arsynco, Inc. Generally accepted engineering practice dictates that process vessels and pipe have a working pressure rating above that called for by a given process and be made of material(s) resistant to corrosion by the chemicals contained (< 15 mils/yr). Vessels are sized so that they run no more than 85% full (after accounting for temperature expansion) unless other, special, considerations prevail. In electrical classification, Arsynco adheres to Group I, Division II, Class C/D, or better, installations unless other, special, considerations prevail.

Criteria for operation are based upon findings from laboratory studies performed by chemists in a Development Group and/or years of operation in a given process area. These are used to write Standard Operating Procedures for each process, a step-wise description defining all parameters of the operation as it is to be performed. These are made available to the plant operators in the form of an Operating Manual and/or log sheets and the steps explained to them by their supervisors as they are assigned to particular process areas.

The Operating Manuals and/or blank Log Sheets are kept in a file in the front office. They are also detailed in the respective SRMPS submissions, copies of which are maintained in a file held by the Regulatory Affairs Manager.

9. Preventive Maintenance Program Procedures and Records for EHS Equipment.

These are detailed in respective SRMPS submissions. Subsequent inspection records, as well as copies of the original SRMPS

submissions, are maintained in a file held by the Regulatory Affairs Manager.

10. Annual Tabulation of EHS Equipment Inspected and Tested versus EHS Equipment Scheduled for Inspection and Test.

These will be kept in a file held by the Regulatory Affairs Manager.

ATTACHMENT - B

MATERIAL DEFICIENCIES AND ITEMS NOT APPLICABLE IN THE ARSYNCO RISK MANAGEMENT PROGRAM

EXCEPT AS NOTED BELOW ALL PARTS OF THE ARSYNCO RISK MANAGEMENT PROGRAM ARE APPROVABLE.

N.J.A.C. 7:31-3.3

DOCUMENTATION

- (c)-5 Provide updated Process Flow and Process & Instrumentation drawings in accordance with the definitions of these documents.
- (e)-5 Add provisions for dates, signatures, and revisions on the one line diagrams.
- (e)-8 Provide an updated list for criteria for design and operation for the EHS facility as required by the regulations.

N.J.A.C. 7:31-3.4

SAFETY REVIEW

- (d) Provide a new annual Safety Review in accordance with the regulations, following completion of the updated process flow and instrumentation drawings.
- (d)-6iii In accordance with the safety review conducted:
- 1. Complete piping on the MMA outdoor storage tank, O/C including pumping facilities.
- 2. Provide for flame arrestors on vent lines R-700 OK condenser, TS 6&7, TS 241-2 and-1.

N.J.A.C 7:31-3.5 STANDARD OPERATING PROCEDURES

- (b) Provide operating procedures for receiving, unloading and storage of TDI drums.
- (c)-3 Provide a description of abnormal conditions as required by this section.

 OPERATION PROCEDE
- (c)-4 Provide a description for emergency conditions as required by this section.
- (c)-7 Provide a shutdown procedure as required by this section.
- (c)-11 Provide a procedure for preparation of equipment for maintenance.
- (c)-15 Provide for an EHS operator to be in attendance at all times, or provide EHS monitors reporting to a continuously attended station.
 - (d) Add a statement that all modifications are made in accordance with N.J.A.C. 7:31-2.11.
 - (e) Add a statement that all modifications are incorporated in the SOP before implementation.

N.J.A.C. 7:31-3.6 PREVENTIVE MAINTENANCE

- (a)-2 Add a statement showing that all modifications are approved by the responsible manager.
- (a)-6 Provide for a procedure for commissioning and decommissioning equipment.
- (a)-8 Provide for documentation of all training and meetings, in accordance with the regulations.
- (a)-9 Provide for procedures for work done by contractors to be in accordance with the regulations.

N.J.A.C. 7:31-3.7 OPERATOR TRAINING

- (a)-2 Provide for evaluation procedures for EHS operator training.
- (a)-3 Provide time period requirements for operator training.
- (b)-1 Provide details of each element of operator training covered in this section.
- (e) Provide for documentation of all training of EHS operators as required by this section.

N.J.A.C. 7:31-3.8 ACCIDENT INVESTIGATION

- (a)-5v Provide for procedures for retraining of operators as required by the regulations.
- (a)-6 Provide for review of accident reports as part of the operator training program.
- (b) Provide for written accident reports to contain all elements of this section as required. (MODIFY SPILL + RFLEASE
- (c) Provide for accident investigation records to include all information required by this section.

N.J.A.C. 7:31-3.9 RISK ASSESSMENT

- (c)-4iii Conduct a State of the Art study for TDI and MMA as required by the regulations.
- (c)-5iv Provide a schedule for implementation of the listed risk reduction measures.
- 1. Provide for installation of overtemperature alarm on the TDI hot storage room .
- 2. Provide for use of a downturned vent on the TDI storage drums.
 - 3. Provide for a scheduled testing of MMA lines.

N.J.A.C. 7:31-3.10

EMERGENCY RESPONSE

- (a)-9 Provide for emergency response training for all site personnel including details of of each element in this section.
- (a)-10 Provide for emergency response training for the emergency response team as required in this section.
- (a)-11i Provide for a minimum of two drills per year .
- (a)-12i Provide a map showing primary and alternate evacuation routes for the facility.

THE ABOVE SHALL BE COMPLETED WITHIN 120 DAYS FOLLOWING APPROVAL OF THE RISK MANAGEMENT PROGRAM.



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY

TRENTON, NJ 08625 CN 027,



IN THE MATTER OF

ARSYNCO, INC.

P.O. BOX 8

CARLSTADT, NEW JERSEY 07072

LOG #T910034

ADMINISTRATIVE ORDER

This ADMINISTRATIVE ORDER is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:1D-1 et seq., the Air Pollution Control Act, N.J.S.A. 26:20-1 et seq., and the Toxic Catastrophe Prevention Act, N.J.S.A. 13:1K-19 et seq. (the "Act" or "TCPA"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

- Pursuant to N.J.A.C. 7:31-2.6(h), if the Department and the registrant reach agreement on the Risk Management Program ("RMP"), the registrant shall enter into a consent agreement with the Department and shall comply with the consent agreement.
- 2. Pursuant to N.J.A.C. 7:31-2.4(h), no registrant with an approved RMP shall handle, use, manufacture, store or generate an Extraordinarily Hazardous Substance ("EHS") except in a manner which complies with the approved RMP.
- 3. On November 18, 1989, you entered into a consent agreement with the Department, signifying an approved RMP for your facility with N.J. TCPA Reg.# 5005, located at the Foot of 13th Street, Boro of Carlstadt, Lot(s) 1, Block(s) 91, County of Bergen, State of New Jersey.
- On January 15, 1991, the Department conducted an investigation of your facility to verify compliance with the approved RMP. This investigation indicated item(s) of non-compliance with the approved RMP and the consent agreement, in violation of N.J.A.C. 7:31-2.4(h) and 2.6(h).

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED THAT pursuant to N.J.A.C. 7:31-2.4(h), 5. Arsynco, Inc. must take measures to bring the approved RMP into compliance with N.J.A.C. 7:31-3.1 et seq.. These required measures and the time schedule to correct the items of non-compliance with the approved RMP are set forth in Attachment II.



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY

CN 027. TRENTON, NJ 08625



Environmental Enforcement

Let's nontext our earth

IN THE MATTER OF ARSYNCO, INC.

P.O. BOX 8
CARLSTADT, NEW JERSEY 07072

LOG #T910034

ADMINISTRATIVE ORDER

This ADMINISTRATIVE ORDER is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:1D-1 et seq., the Air Pollution Control Act, N.J.S.A. 26:2C-1 et seq., and the Toxic Catastrophe Prevention Act, N.J.S.A. 13:1K-19 et seq. (the "Act" or "TCPA"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

- 1. Pursuant to N.J.A.C. 7:31-2.6(h), if the Department and the registrant reach agreement on the Risk Management Program ("RMP"), the registrant shall enter into a consent agreement with the Department and shall comply with the consent agreement.
- 2. Pursuant to N.J.A.C. 7:31-2.4(h), no registrant with an approved RMP shall handle, use, manufacture, store or generate an Extraordinarily Hazardous Substance ("EHS") except in a manner which complies with the approved RMP.
- 3. On November 18, 1989, you entered into a consent agreement with the Department, signifying an approved RMP for your facility with N.J. TCPA Reg.# 5005, located at the Foot of 13th Street, Boro of Carlstadt, Lot(s) 1, Block(s) 91, County of Bergen, State of New Jersey.
- 4. On January 15, 1991, the Department conducted an investigation of your facility to verify compliance with the approved RMP. This investigation indicated item(s) of non-compliance with the approved RMP and the consent agreement, in violation of N.J.A.C. 7:31-2.4(h) and 2.6(h).

ORDER

5. NOW, THEREFORE, IT IS HEREBY ORDERED THAT pursuant to N.J.A.C. 7:31-2.4(h), Arsynco, Inc. must take measures to bring the approved RMP into compliance with N.J.A.C. 7:31-3.1 et seq.. These required measures and the time schedule to correct the items of non-compliance with the approved RMP are set forth in Attachment II.

ARSYNCO, INC. LOG #T910034 PAGE 2

GENERAL PROVISIONS

- 6. Pursuant to N.J.S.A. 13:1K-30b, you are entitled to an adjudicatory hearing if aggrieved by this Order. Written application for such a hearing must be made pursuant to N.J.A.C. 7:31-6.3(a) and must be received by the Department within twenty (20) calendar days from receipt of this Order. In applying for such hearing, you must furnish the Department with the information listed in SectionIII of Attachment IE. If no request for an adjudicatory hearing is received within twenty (20) calendar days, this Administrative Order shall become a Final Order.
- 7. The provisions of this Order shall be binding on you, your principals, agents, employees, successors, assigns, tenants and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 8. No obligations imposed by this Order are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety and welfare.
- 9. NOTICE IS GIVEN, that pursuant to N.J.S.A. 13:1K-30b, any person who violates the provisions of the Act, or any code, rule, regulation or order promulgated or issued pursuant thereto, shall be liable to a penalty of not more than \$10,000 for the first offense, not more than \$20,000 for the second offense, and up to \$50,000 for the third and each subsequent offense. If the violation is of a continuing nature, each day during which it continues constitutes an additional, separate and distinct offense.
- 10. NOTICE IS FURTHER GIVEN, that pursuant to N.J.S.A. 13:1K-30d, any person who violates the provisions of the Act, or any code, rule, regulation or order promulgated or issued pursuant thereto, or who fails to pay a civil administrative penalty in full, shall be liable for a civil penalty not to exceed \$10,000 per day of the violation, and each day's continuance of the violation constitutes a separate and distinct violation.

Dated: July 19, 1991

Donald F. Patterson, Assistant Director

Environmental Enforcement

CERTIFIED MAIL

Skul - 12

TOXIC CATASTROPHE PREVENTION ACT PROGRAM - ATTACHMENT 1E

Adjudicatory Hearing Request Checklist and Tracking Form for Enforcement Document(s)

Enforcement Document(s) Being Appealed:

I.

Issuan	ce Date of Enforcement Document(s) Document Log Nu
Person	Requesting Hearing:
Name	Name of Attorney, if app
Addres	Address of Attorney
ri⊾. é.1	11i information much be substant a succession on the substant and succession of the succession of the substant and suc
hearin	llowing information must be submitted upon requesting an adjud
	The date the alleged violator received the enforcement document
	contested;
B	
^	A list of all issues being appealed;
	An admission or denial of each of the findings of fact, or
·	An admission or denial of each of the findings of fact, or statement of insufficient knowledge.
D.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce
D.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document;
D. E.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request;
D. E. F. G.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate
D. E. F. G.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons;
D. E. F. G.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locat: physically disabled persons; A clear indication of any willingness to negotiate a settleme
D. E. F. G.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your
D. E. F. G.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your request to the Office of Administrative Law;
D. E. F. G. H.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your request to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFO
D. E. F. G. H.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your request to the Office of Administrative Law;
D. E. F. G. H.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your request to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFO LISTED ABOVE, INCLUDING ATTACHMENTS SHALL BE SUBMITTED TO: 1. Donald F. Patterson, Assistant Director, Environment of the processing of the state of the control of the submitted to:
D. E. F. G. H.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your request to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFO LISTED ABOVE, INCLUDING ATTACHMENTS SHALL BE SUBMITTED TO: 1. Donald F. Patterson, Assistant Director, Environmental Quality, Complement, Division of Envi
D. E. F. G. H.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your request to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFO LISTED ABOVE, INCLUDING ATTACHMENTS SHALL BE SUBMITTED TO: 1. Donald F. Patterson, Assistant Director, Environment of the processing of the state of the control of the submitted to:
D. E. F. G. H.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your request to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFO LISTED ABOVE, INCLUDING ATTACHMENTS SHALL BE SUBMITTED TO: 1. Donald F. Patterson, Assistant Director, Environment, Division of Environmental Quality, Office of New Jersey 08625-0027
D. E. F. G. H.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your request to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFO LISTED ABOVE, INCLUDING ATTACHMENTS SHALL BE SUBMITTED TO: 1. Donald F. Patterson, Assistant Director, Environment, Division of Environmental Quality, Office of New Jersey 08625-0027
D. E. F. G. H.	An admission or denial of each of the findings of fact, or statement of insufficient knowledge. The defenses to each of the findings of fact in the enforce document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing locate physically disabled persons; A clear indication of any willingness to negotiate a settlementhe Department prior to the Department's processing of your request to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFO LISTED ABOVE, INCLUDING ATTACHMENTS SHALL BE SUBMITTED TO: 1. Donald F. Patterson, Assistant Director, Environment, Division of Environmental Quality, Office of Legal Affairs 2. Richard J. McManus, Director, Office of Legal Affairs

ATTACHMENT II

ARSYNCO INCORPORATED ANNUAL REVIEW - TCPA # 5005 (toluene diisocyanate (TDI) (methyl amine)

N.J.A.C. 7:31-2.5

REGISTRATION

Submit a new registration form showing J. Dillon as the responsible manager and register for higher quantities of monomethyl amine and toluene diisocyanate (TDI) in accordance with current inventory records.

N.J.A.C. 7:31-3.4 SAFETY REVIEW

Conduct a Safety Review for the R 700 methyl amine reactor and include a listing of all safety devices and interlocks in the system, and their settings.

N.J.A.C. 7:31-3.5

STANDARD OPERATING PROCEDURES

Provide a procedure for preparation of equipment for maintenance including the existing cleanout procedure.

N.J.A.C. 7:31-3.6 PREVENTIVE MAINTENANCE

(a)1. Issue a list identifying all EHS equipment included in the Preventive maintenance program.

- statement Provide a insuring that modifications approved by the responsible manager are made and that communications are maintained between maintenance, production, safety, and engineering departments.
- Provide a procedure to insure that work performed by outside contractors will be done in accordance with the requirements of the preventive maintenance program.

N.J.A.C. 7:31-3.9 RISK ASSESSMENT

(c)5 iv.

- Provide a program for non-destructive testing of methylamine vessels and piping in accordance with state of the art.
- 2. Repair weather station recording meter.
- Install high level alarm on the monomethyl amine З. storage tank. (within 270 days)
- 4. Provide a log sheet for equipment lockout.

N.J.A.C. 7:31-3.10

EMERGENCY RESPONSE

(a)12i Provide a map showing primary and secondary evacuation routes for the facility and have it posted in the operating area.

EXCEPT WHERE SPECIFICALLY INDICATED, THE ABOVE SHALL BE COMPLETED WITHIN 120 DAYS FOLLOWING RECEIPT OF THIS ADMINISTRATIVE ORDER.

ARSYNCO-1991 TCPA# 5005

CC des EI Julie)



State of New Jersey Department of Environmental Protection and Energy

Division of Environmental Safety, Health and Analytical Programs CN 424

Trenton, NJ 08625-0424 Tel. # 609-633-7964 Fax.#609-292-5450

Scott A. Weiner Commissioner

Gerald P. Nicholls, Ph.D. Director

<u>CERTIFIED MAIL P373550279</u> <u>RETURN RECEIPT REQUESTED</u> February 8, 1993

Lecuved of 11/92

Mr. J. Fedder
Arsynco Incorporated
P.O. Box 8
Carlstadt, New Jersey 07072

<u>REFERENCE</u>: N.J.A.C. 7:31-2.12 (d) Addendum to the Risk Management Program Consent Agreement of 11/18/89 for Foot of 13th street, Carlstadt, New Jersey TCPA ID #5005.

Dear Mr. Fedder:

Enclosed is a Draft Addendum to the Consent Agreement prepared by the Department of Environmental Protection and Energy ("the Department") for your facility.

The Draft Addendum is the result of a review of documents and a site inspection conducted on 1/26/93. The Draft Addendum contains the portions of the Risk Management Program ("RMP") additional to those of the original Consent Agreement which are materially deficient, the proposed actions that must be taken to correct the material deficiencies and the proposed time schedule for taking the actions to correct the material deficiencies.

1 3/10/93

Within 30 days, please sign and return the Addendum or submit your proposals to correct the deficiencies. If the Department does not reach agreement with Arsynco on the measures necessary to correct the deficiencies or omissions in the RMP, the Department shall prepare and send an Administrative Order pursuant to N.J.A.C. 7:31-2.6 (i) integrating the proposed Addendum to the Consent Agreement and advise Arsynco of its rights to an adjudicatory hearing pursuant to N.J.A.C. 7:31-6.3 (b).

RECEIVED FEB 1 2 1993 Please contact M. Wagshul at (609) 984-3693 if you have any questions regarding the Draft Addendum.

Your continued cooperation is appreciated.

Sincerely,

Reginald Baldini, Acting Chief Bureau of Release Prevention

cc: M. Wagshul File: 5005.01.6

RISK MANAGEMENT PROGRAM CONSENT AGREEMENT ADDENDUM Number 2

ARSYNCO INCORPORATED ("ARSYNCO")

The following Addendum to the Consent Agreement of 11/18/89 is issued pursuant to the authority vested in the Commissioner of the State of New Jersey Department of Environmental Protection and Energy ("The Department") by N.J.S.A. 13:1D-1 et seq. and the Toxic Catastrophe Prevention Act N.J.S.A. 13:1K-19 et seq. and duly delegated to the Assistant Director, Release Prevention Element, Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4 and amendments made thereto.

A Risk Management Program ("RMP") shall, at a minimum, include:

- 1. Safety review of design for new and existing Extraordinarily Hazardous Substances ("EHS") facilities;
- Standard operating procedures;
- 3. Preventive maintenance program;
- Operator training;
- Accident investigation procedures;
- 6. Risk assessments for specific pieces of EHS equipment or operating alternatives;
- 7. Emergency response program;
- 8. Internal or external risk management program audit procedures.

The Consent Agreement executed by Arsynco and the Department specified items of deficiency determined by the Department during its initial review of policies, standards and procedures for each respective program element and the persons or positions responsible for ensuring their implementation.

Arsynco hereby agrees to take the indicated corrective actions for the deficiencies and respective corrective actions set forth in Attachment "A" herewith and to comply with the schedule as indicated. Arsynco agrees to submit to the Department a progress report, prior to the fifteenth of each month, showing implementation of corrective actions and compliances with the indicated schedule.

RECEIVED

FEB 1 2 1993

Arsynco agrees to comply with all requirements of this Addendum and its approved RMP. Pursuant to N.J.A.C. 7:31-6.4 the Department may assess a civil administrative penalty of not more than \$10,000 for the first offense, not more than \$20,000 for the second offense, and up to \$50,000 for the third and each subsequent offense for each violation of the Toxic Catastrophe Prevention Act and for violations of any rule, Consent Agreement or Administrative Order issued pursuant thereto.

Submissions to the Department should be sent to:

Attachment:

Chief

Bureau of Release Prevention
Division of Environmental Quality
NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
AND ENERGY

CN-027

Trenton, New Jersey 08625

DATE:	BY:
	TITLE:
	for Arsynco
DATE:	BY:
	TITLE:
	for BUREAU OF RELEASE PREVENTION

ATTACHMENT - A

ARSYNCO INCORPORATED ANNUAL REVIEW - 1992 TCPA #5005 (monomethyl amine)

N.J.A.C. 7:31-2.11 MODIFICATIONS

(a) Provide for signatures of the responsible manager on each revised copy of the standard operating procedure.

N.J.A.C. 7:31-3.3 DOCUMENTATION

(c) 5 Indicate on the piping and instrumentation diagram for the monomethyl amine process, that all lines exposed to the environment are blanked off.

N.J.A.C. 7:31-3.4 SAFETY REVIEW

(d) 4 For future safety reviews, indicate the names of the EHS operators interviewed for the study.

N.J.A.C. 7:31-3.5 STANDARD OPERATING PROCEDURES

- (c) 1 Add a copy of the piping and instrumentation diagram to the standard operating procedure.
- (c) 8 Add a description of the type and location of pressure safety relief devices, interlocks and alarms with their respective activation points, to the standard operating procedure.

N.J.A.C. 7:31-3.6 PREVENTIVE MAINTENANCE

- (a) 3 1. Provide for thickness testing of the monomethyl amine storage tank and piping on a routine scheduled basis.
- 2. Provide for sealing the open electrical box above the storage tank.
- 3. Provide for checking the integrity of the electrical grounding wire and indicate in the Preventive Maintenance file.
- (a) 5 Provide for revising the testing procedure for the high level alarm on the monomethyl amine storage tank, to include provisions for simulating a high level in the tank.

- (a) 6 Add to the procedures for commissioning equipment for indicating the required authorizations and supervision for implementation of the procedure.
- (a)8 Provide for documentation of training for maintenance personnel on codes and practices and materials of construction.

N.J.A.C. 7:31-3.7 EHS OPERATOR TRAINING

- (a) Provide for a minimum passing grade for evaluating testing of EHS operators, with appropriate documentation and retraining of operators who fail to pass the test.
- (f) Provide a tabulation of operator training performed during the previous year and indicate the specific areas of training listed in this section of the regulations.

N.J.A.C. 7:31-3.9 RISK ASSESSMENT

- (c)1&2 For future hazard analyses, conduct studies with a team trained to perform hazard analysis, select one of the prescribed methods of hazard analysis, and follow the format listed in this section of the regulation.
- (k) 1. Investigate need for inerting atmosphere above the monmethyl amine in the reactor.

N.J.A.C. 7:31-3.10 EMERGENCY RESPONSE

- (a) 8iii Provide for use of portable EHS gas detectors in the event of a release.
- (a) 10 Provide for an updated list showing the current members of the the emergency response team.
- (a) 10 Provide for emergency response training in rescue procedures.
- (a) 11 Provide for followup on recommendations resulting from implementation of the emergency response drill program.
- (b)1 Provide a description and location of EHS materials at the site.
- (b) 2 Provide an updated list every six months of the emergency response equipment and supplies and their location at the site.
- (b) 5 Add expected time of arrival for each of the outside responder agencies.

Arsynco - TCPA# 5005 Annual Review - 1992 (b)8 add a description of the onsite handheld EHS monitoring equipment and it's location (Draeger tubes).

EXCEPT WHERE SPECIFICALLY INDICATED IN PARENTHESIS, THE ABOVE SHALL BE COMPLETED WITHIN 90 DAYS FOLLOWING RECEIPT OF THIS CONSENT AGREEMENT ADDENDUM.



P.O Box 8 • Caristadt, N.J. 07072 201 - 933 - 2323

March 9, 1993

Mr. Reginald Baldini, Acting Chief Bureau of Release Prevention Department of Environmental Protection CN 424 401 E. State St. Trenton, N. J. 08625-0424

Ref.: TCPA ID #5005

Dear Mr. Baldini,

Englosed is your 2/8/93 Draft Addendum to the Risk Management Program Consent Agreement of 11/18/89 which we have signed with initialled corrections made after consultation with Nr. M. Wagshul of your Department.

Yours truly,

Jack B. Feder

Technical Director, Environmental

ee: J. Dillon

E. Ippolito

D. Space

RISK MANAGEMENT PROGRAM CONSENT AGREEMENT ADDENDUM Number 2

ARSYNCO INCORPORATED ("ARSYNCO")

The following Addendum to the Consent Agreement of 11/18/89 is issued pursuant to the authority vested in the Commissioner of the State of New Jersey Department of Environmental Protection and Energy ("The Department") by N.J.S.A. 13:1D-1 et seq. and the Toxic Catastrophe Prevention Act N.J.S.A. 13:1K-19 et seq. and duly delegated to the Assistant Director, Release Prevention Element, Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4 and amendments made thereto.

A Risk Management Program ("RMP") shall, at a minimum, include:

- 1. Safety review of design for new and existing Extraordinarily Hazardous Substances ("EHS") facilities;
- Standard operating procedures;
- Preventive maintenance program;
- Operator training;
- 5. Accident investigation procedures;
- 6. Risk assessments for specific pieces of EHS equipment or operating alternatives;
- Emergency response program;
- 8. Internal or external risk management program audit procedures.

The Consent Agreement executed by Arsynco and the Department specified items of deficiency determined by the Department during its initial review of policies, standards and procedures for each respective program element and the persons or positions responsible for ensuring their implementation.

Arsynco hereby agrees to take the indicated corrective actions for the deficiencies and respective corrective actions set forth in Attachment "A" herewith and to comply with the schedule as indicated. Arsynco agrees to submit to the Department a progress report, prior to the fifteenth of each month, showing implementation of corrective actions and compliances with the indicated schedule.

RECEIVED

FEB 1 2 1993

Arsynco agrees to comply with all requirements of this Addendum and its approved RMP. Pursuant to N.J.A.C. 7:31-6.4 the Department may assess a civil administrative penalty of not more than \$10,000 for the first offense, not more than \$20,000 for the second offense, and up to \$50,000 for the third and each subsequent offense for each violation of the Toxic Catastrophe Prevention Act and for violations of any rule, Consent Agreement or Administrative Order issued pursuant thereto.

Submissions to the Department should be sent to:

Chief

Bureau of Release Prevention Division of Environmental Quality NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY

CN-027

Trent	on, New Jersey 08625	
DATE: March 9 199.	BY: Jack Bleck	
	TITLE: Tock Div. Environment	- -(
•	for Arsynco	
DATE:	BY:	
•	TITLE:	
•	for BUREAU OF RELEASE PREVENTION	N

Attachment:

ATTACHMENT - A

ARSYNCO INCORPORATED ANNUAL REVIEW - 1992 TCPA #5005 (monomethyl amine)

N.J.A.C. 7:31-2.11

MODIFICATIONS

(a) Provide for signatures of the responsible manager on each revised copy of the standard operating procedure.

N.J.A.C. 7:31-3.3

DOCUMENTATION

(c)5 Indicate on the piping and instrumentation diagram for the monomethyl amine process, that all lines exposed to the environment are blanked off.

N.J.A.C. 7:31-3.4

SAFETY REVIEW

(d) 4 For future safety reviews, indicate the names of the EHS operators interviewed for the study.

N.J.A.C. 7:31-3.5

STANDARD OPERATING PROCEDURES

- (c) 1 Add a copy of the piping and instrumentation diagram to the standard operating procedure.
- (c)8 Add a description of the type and location of pressure safety relief devices, interlocks and alarms with their respective activation points, to the standard operating procedure.

N.J.A.C. 7:31-3.6

PREVENTIVE MAINTENANCE

- (a) 3 1. Provide for thickness testing of the monomethyl amine storage tank and piping on a routine scheduled basis.

 (WITHIN 210 DAYS FROM RECEIFT OF THIS CONSENT AGREEMENT ADDENDUM) 17/14/2
- 2. Provide for sealing the open electrical box above the storage tank.
- 3. Provide for checking the integrity of the electrical grounding wire and indicate in the Preventive Maintenance file.

 Maintenance file.

 (WITHIN TO DAYS FROM RECEIPT OF THIS CONSENT ACREMENT AWENDEM) JITEMENT (WITHIN TO DAYS FROM RECEIPT OF THIS CONSENT ACREMENT AWENDEM)

Arsynco - TCPA# 5005 Annual review - 1992

- (a) 6 Add to the procedures for commissioning equipment for indicating the required authorizations and supervision for implementation of the procedure.
- (a)8 Provide for documentation of training for maintenance personnel on codes and practices and materials of construction.

N.J.A.C. 7:31-3.7 EHS OPERATOR TRAINING

- (a) Provide for a minimum passing grade for evaluating testing of EHS operators, with appropriate documentation and retraining of operators who fail to pass the test.
- (f) Provide a tabulation of operator training performed during the previous year and indicate the specific areas of training listed in this section of the regulations.

N.J.A.C. 7:31-3.9 RISK ASSESSMENT

- (c) 1&2 For future hazard analyses, conduct studies with a team trained to perform hazard analysis, select one of the prescribed methods of hazard analysis, and follow the format listed in this section of the regulation.
- (k) 1. Investigate need for inerting atmosphere above the monmethyl amine in the reactor.

N.J.A.C. 7:31-3.10 EMERGENCY RESPONSE

- (a) 8iii Provide for use of portable EHS gas detectors in the event of a release.
- (a) 10 Provide for an updated list showing the current members of the the emergency response team.
- (a) 10 Provide for emergency response training in rescue procedures.
- (a) 11 Provide for followup on recommendations resulting from implementation of the emergency response drill program.
- (b) 1 Provide a description and location of EHS materials at the site.
- (b) 2 Provide an updated list every six months of the emergency response equipment and supplies and their location at the site.
- (b) 5 Add expected time of arrival for each of the outside responder agencies.

Arsynco - TCPA# 5005 Annual Review - 1992 (b)8 add a description of the onsite handheld EHS monitoring equipment and it's location (Draeger tubes).

EXCEPT WHERE SPECIFICALLY INDICATED IN PARENTHESIS, THE ABOVE SHALL BE COMPLETED WITHIN 90 DAYS FOLLOWING RECEIPT OF THIS CONSENT AGREEMENT ADDENDUM.



P.O. Box 8 · Carlstadt, N.J. 07072

April 17, 1990

N.J. Dept. of Environmental Protection Division of Environmental Quality ir Pollution Control Permit Program Lureau of New Source Review CN 027

renton, N. J. 08625

Attention of Mr. L. Mikolajczyk, Chief

Ref: Log # 01-88-2199
Air Stripper
Conditional Permit
(3/2/90 approval date)

Dear Mr. Mikolajczk,

Your letter of 3/6/90 relative to the conditions imposed on the referenced permit indicates that:

"2. The maximum pumping rate through the air stripper shall be 200 gallons per minute. A flow meter and continuous recorder acceptable to the Department shall be installed and operated to monitor the flow to the stripper."

We wish to propose for this service our use of a Foxboro 3" vortex flowmeter (Model E83W) coupled to a Foxboro round chart recorder (Model 40). Uninstalled cost to Arsynco for these items is estimated to be \$3,100.

Please inform us as to whether this is acceptable to your Department so that we may initiate purchase of these items.

Also, please note that the 200 gallon per minute flow rate to the scrubber is its design flow rate. When you indicate that flow to the stripper should not exceed 200 gallons per minute, we would anticipate a normal process fluctuation about that design point of about +/- 10%.

We therefore believe that to operate at the design point, an amendment to our permit which would set the maximum flow at 220 gallons per minute is necessary and is herewith requested. Note that this will not change any emission rate specified for the present permit.

Yours truly

Jack B. Feder Technical Director cc: W. Bennett

E. Chormanski, Chief, Bureau of Technical Services, NJ DEP

G. Danis (Counsel)

J. Dillon

D. Space

en a de la distriction de client find font. Con grandema dels principles principles de la distribución de la	of the Space on the repaise foliation wis of the ordered	services are desired, and complete terms and find failure to on this will present this can the will present this can the area of the details complete to fee a read action. Common Joseph and for fee this can be detailed to fee the can be detailed to fee the can be detailed.	
Mr. L. Mikolaje	zyk, Chief	4 Article Number	•
Guality Air Pollution (Brogram	untrol Permit	Typo al Service: Radhered Insured CCO Corbids Return Account for My Type Lifes	•
bureau wi llew S Claf27aTrancons	prce Review	Always obtain signature to autoo examble of agents and DAA 310 310 of agents	
Signature Couent		8. Addressee's Address athly frequested and fee puds	
Gate of Delivery		1	
Funn 3811, 476 1949	-US GFO 1963-238-815	DOMESTIC REJURN RECEN	 ? T

Effelen. Cameric stems 1 and 2 when additional services are desired, and complete items The third light and to the Mc Cities 10. Supplement the reverse and Following go this will prevent it is data and the plantage forces. The property of the first of the set and for the set in the set in the set in the set and for the set of the set in the set of th State to estate denvered date and addresse's sources. 2. 2 Restricted Desvely 1 Arte & Addressed to. dr. E. Chormanski, Chief Tree of Service: Man Jersey Department of Environmental Eggrection CCD dureau off fechnidill Services ... Espinas Mal. CH-027 Atmays palant signature of Addictors franton, jew Jergija 08625 QI aguni and CA16 Cfcreiffig Addiesses & Address (INL) requested and see paids 1 Date of Summerly DOMESTIC RETURN RECEIPT

3 faca 3811, apr 2019.

N.J. Dept. of Environmental Protection Division of Environmental Quality Air Pollution Control Permit Program Bureau of New Source Review CH 827 Trenton, N. J. 08625

Attention of Mr. L. Mikolajczyk, Chief

Ref: Log # 81-88-2199 Air Stripper Conditional Permit (3/2/90 approval date)

Dear Mr. Mikolajczk,

Your letter of 3/6/90 relative to the conditions imposed on the referenced permit indicates that:

"2. The maximum pumping rate through the air stripper shall be 200 gallons per minute. A flow meter and continuous recorder acceptable to the Department shall be installed and operated to monitor the flow to the stripper."

We wish to propose for this service our use of a Foxboro 3" vortex flowmeter (Model £83W) coupled to a Foxboro round chart recorder (Model 44). Uninstalled cost to arsynco for these items is estimated to be \$3,100.

Please inform us as to whether this is acceptable to your Department so that we may initiate purchase of these items.

Also, please note that the 200 gallon per minute flow rate to the scrubber is its design flow rate. When you indicate that flow to the stripper should not exceed 200 gallons per minute, we would anticipate a normal process fluctuation about that design point of about +/- 104.

We therefore believe that to operate at the design point, an amendment to our permit which would set the maximum flow at 228 gallons per minute is necessary and is herewith requested. Note that this will not change any emission rate specified for the present permit.

Yours truly

ick B. Feder

Technical Director

cc: W. Bennett

E. Chormanski, Chief, Eureau of Technical Services, NJ DEP

G. Danis (Counsel)

J. Dillon

D. Space

9 1,334	
Fully of Establishment All (1916) All Space on the cuver for noticing received to the cuver of the same statement of the same statement of the same same same same same same same sam	ne side. Padura to datinis will pravent this card. Da vau the nere a of the patistic said a la tra sing.
from 1915 to hereign in a substance field the thirthwell server in 1912 to 1914 for all the substance was earlier as the six was earlied.	ces are available. Consul postriustor for face
1 Show to official defendad, Gate, and estinguese's	
d tien Airge	Etita Chirges
•	4_Artere Mumger 12/7
lir. dyron Sullivan, Regional	
Enforcement Officer	Type of Service:
N.J. DEP, Div. of Environmen	Ud France Trees
- Reality, Air Pollution Cor	Emina Luis Rat on Account
trol Persit Program, 2 Bab	COCI in or an anonature of address of
Place, West Orange, HJ 07052	Of agent and DATE GELIVERED
6 Sgrature - Addresses }?	8. Addressee's Address (UNL)
X / ///	requested and fee paid)
d. Signature - Agent	
X	
7. Date of Deliyery O _ /	\^.
	1 x -
PS Farm 3811, Apr 1869 .us apo incassa	DOMESTIC RETURN RECEIPT
,	· · · · · · · · · · · · · · · ·
A SELDER: Complete name 1 and 2 when additional	services ate desired, and conjects its
1 194 4	and barbara to do that mill commed to a Co. 1
fan de gretumes to soe. (<u>De fetylm lede aftige od Brands</u> Rig <u>skie it de nere,</u> for allaktional fees the following service	nan tie unibe of fice gutage be main 21,413
a to 17414 SGA est for addit Shal berviewst fedinasium	
 Show to anomigativered, data, and addressed a a (Euro charge) 	Idioss. 2. G. Restricted Delivery
J. Article Addressed to:	A Assigle Number / 65
r. E. Chormanski. Chief	1393 404 367 1
J DEP, Div. Environmental	Type of Service:
Quality, Air Pallution Contro	☐ Registered > ☐ Ineured
ermit Program; Bureau of Tec	
	Enjeuse Mat Matinin Recupt
iervices (i CN)27.(2)	garage obtain argnature of electroscue
Francischen Jaggey 08625	OF egent and DATE OFFICE
Signatura Die aurabaga figie	B. Addressee's Address (CNLY J
رومیل ۱۹۰۱ x	tequesicil and fee pauls
6 S. Schelure (73 Sent	
x C) [~	1 5 1
7 Date of Delivery	1
	1
5 Form 3811, Apr 1-19	DOLLEGIO DE PUBLICACIONE
	Domestic heturn receipt
	DOMESTIC WETOWN RECEIPS

SELLEER, Commute itunts I and 2 when edditional services are desired, this complete items 1, 14 This is the Red into TO " Seaze or the receptarisate. Fedure to gotthe will prevent the cala there exists the limitative spirit fee in Agrania 204 in Ball a distributed desired for a large of the following devices the deadless formally sections as a second section of the second sections as a second section of the second seco Z Rosincted Jeniere an ta eine a au innfal dafa bild adtreasue's atteress. ·Eires courges Luca and ere J Air. a Auffeines fo: Mr. L. Mikolajczyk, Chief Type of Service: HJ DEP, Div. Environmental Quality, Air Pollucion Control Confin Perale Program, Bureau of Tech tomou Services, Chill والتحافله إذ والمالين والالله ويوجه Treaton and Jarsey! 08625



P O Box 8 · Caristaux h J 6/072 201-331-2323

April 18, 1998

N.J. Dept. of Environmental Protection Division of Environmental Quality Air Pollution Control Permit Program Bureau of Enforcement Operations 2 Babcock Place West Orange, N. J. 07052

Attention of Mr. Byron Sullivan, Regional Enforcement Officer Ref: Log # 01-88-2199 Air Stripper Conditional Permit (3/2/98 approval date)

Dear Mr. Sullivan,

In a letter dated 3/6/90 a conditional permit was granted us for operation of the above referenced air stripper. However, one of the conditions calls for installing a DEP acceptable system for measuring and recording the water flow to the stripper, while another condition requires that we sample the water stream to the stripper and use the analysis of this stream in conjunction with the flow rate to obtain (and report to DEP) the VOS flowrate to the stripper.

Because we do not yet have the flowmetering system in place (see attached letter requesting DEP acceptance of a proposed system), we are not in a position to implement the second of the conditions noted in the preceding paragraph. We therefore now ask for in extension of time for implementation of that second condition unt. We are able to obtain DEP approval, purchase the components and institute system.

Yours truly,

G. W. Bennett

E. Chormanski, Chief, Bureau of
Technical Services, NJ JEP

G. Danis (Counsel)

J. Dillon

L. Nikolajczyk, Chief Tech Dir
Bureau of New Source Review,
NJ DEP

Jack B. Feder

D. Space



Anthony J. McMahon
Ming Director

State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY Bureau of New Source Review

CN 027 Trenton, N.J. 08625-0027 1-800-441-0065 C: WBenstt J. Pillon E. Spollie D. Space

William O'Sullivan, P.E., Assistant Director Air Quality Engineering and Technology

LEG YED

May 29, 1990

Jack B. Feder Technical Director Arsynco, Inc. P.O. Box 8 Carlstadt, N.J. 07072

REFERENCE: Application Log # 01-88-2199

APC Plant ID # 00098, NJ Stack # 084 Change in Permit/Certificate Conditions

Dear Mr. Feder

This is in response to your letter dated April 17, 1990. In the letter you requested that the Department approve a proposed flow meter for the air stripper in the above referenced permit/certificate and revise the condition which restricts the pumping rate through the air stripper.

I am forwarding a copy of the letter to our Bureau of Technical Services. This Bureau reviews specifications for flow monitoring equipment and should respond to you concerning the adequacy of the proposed flow meter and recorder. I have also reviewed the request in the letter concerning the flow rate to the air stripper. The Department is hereby revising permit/certificate conditions to allow for a 10% increase in liquid flow rate through the air stripper. The revised conditions are attached.

If you have any further questions concerning this matter, you may contact Mr. Marc Lewis of my staff at (609)-292-6716 or (800)-441-0065.

Attached: Revised Conditions

Sincerely,

Louis Mikolajczyk, Chief

Bureau of New Source Review

cc: M. Sabol (Sr 0119)

M. Lewis

File (00098-084)

MRO

E. Choromanski

New Jersey is an Equal Opportunity Employer.

CONDITIONS FOR PERMIT TO CONSTRUCT AND CERTIFICATE TO OPERATE

BNSR Log Number 01-88-2199 Revised 5/29/90

Both the Permit to Construct, Install, or Alter Control Apparatus or Equipment and the Certificate to Operate Control Apparatus or Equipment are conditioned as follows:

- The owner or operator shall not construct, install, use or cause to be used this equipment in a manner which will result in odors being detectable by sense of smell in any area, except for those over which the owner or operator has exclusive use or occupancy. The air stripper operation shall be terminated if it causes citizen's complaints verified by any NJDEP inspector.
- 2. The maximum pumping rate through the air stripper shall be 220 gallons per minute. A flow meter and continuous recorder acceptable to the Department shall be installed and operated to monitor the flow to the stripper.
- 3. The maximum potential emission rate of TVOS as listed in N.J.A.C. 7:27-17.3, shall not exceed 0.08 lbs/hr for the air stripper. The naximum potential emission rate of total volatile organic substances (VOS) as defined in N.J.A.C. 7:27-16 shall not exceed 2.7 lbs/hr for the air stripper.
- 4. The owner or operator shall collect a grab sample of the contaminated water entering the air stripper at least once each month. The sample shall be analyzed for the contaminants listed in the application (form VEM-004, Section G) as well as for total volatile organic substances and toxic volatile organic substances listed in N.J.A.C. 7:27-17. The results shall be reported quarterly to:

Region Chief
Metropolitan Regional Office
2 Babcock Place
West Orange, New Jersey 07052

Each report shall be submitted within 30 days of the end of each calendar quarter. The first quarter of each year begins January 1 of that year. The first report is due at the end of the calendar quarter in which start-up occurs.

5. After six months of sampling, the owner or operator can petition the Department to attain a decrease in the number and types of substances that require monthly sampling. The department shall make its judgment based upon the permit, the six months of groundwater data collected, and the operating history of the air stripper. The owner or operator shall submit this petition to the Regional Chief.

age 2 .og Number 01-88-2199 rised 5/29/90

The emission rate shall be determined using the results of the onthly sampling program outlined in Item 3 and the flow rate into the ever. Total volatilization of all organic substances from the water all be assumed in these calculations.

Sampling and monitoring records required above shall be maintained a permanent bound log book or other means acceptable to the partment on-site for a minimum of 3 years after collection. They hall be made available to representatives of the Department upon quest.

The print and save of the Challetine and the country	
IE to the mid to	If ille initial
1 And a language to: 12. E. Choromanski, Chief	4. Article Number P500 424 567
HIDEP, Div of Env. Quality Fir Pollution Control Permit Bureau of Technical Services	Ci Congres (2 coo
CNO 2.7	Escress Mad Paturi Rece of
The second second	Always, objain signatura ur atique saad GE-1945 AND AND AND AND AND AND AND AND AND AND
1. Supracular - Agade 1 to all	9 6 Addressen's Audices (ONLY) countried and fee puisi
1 X	
7 Cara in Danvery	<u> </u>
	· ·
NOT 0 0 1001)	
Få furin 3811. Apr. 1941	DOMESTIC RETURN ACCEIPT



November 6, 1994

N.J. Dept. of Environmental Protection Division of Environmental Quality Air Pollution Control Permit Program Bureau of Technical Services CN #27 Trenton, N. J. #8625

Attention of Mr. E. Choromanski, Chief

Ref: Log # 01-88-2199, APC Plant ID #00098, NJ Stack #084, Air Stripper Conditional Permit (3/2/90 approval date)

Dear Mr. Choromanski,

In letter of April 17, 1998 addressed to Mr. L. Mikolajczyk, Chief, Bureau of New Source Review (with copy to you), we proposed use of a Foxboro 3" vortex flowmeter (Model EB3W) coupled to a Foxboro round chart recorder (Model 40) to monitor the flow of water to the referenced air stripper and asked that the DEP indicate acceptability of this system. The conditions imposed on the referenced permit are that:

"2. The maximum pumping rate through the air stripper shall be 220 gallons per minute. A flow meter and continuous recorder acceptable to the Department shall be installed and operated to monitor the flow to the stripper."

Mr. Mikolajczyk has indicated, in letter of May 29, 1990, that he would refer this matter to your Bureau. However, at present we are still awaiting an OK for this system. Because we do not yet have the flowmetering system in place, we are not in a position to implement a second condition imposed upon us in the issuance of the referenced permit, namely, that we sample the water stream to the stripper and use the analysis of this stream in conjunction with the flow rate to obtain (and report to DEP) the VOS flowrate to the stripper. We have asked DEP Enforcement for an extension of time for implementation of that second condition until we are able to obtain GEP (your Group's) system approval and purchase and install the components.

We await your response.

Yours truly,

Jack B. Feder

Technical Director

ce: W. Sennett

- Mikolajezyk, Chief, Bureau of New Source Review, NJ DCF
- G. Danis (Counsel)
- J. Dillen
- D. Space
- B. Sullivan, Regional Enforcement Officer, EJ DEP



P.O. Box 8 . Carlstadt, N.J. 201-933-2323

November 6, 1990

N.J. Dept. of Environmental Protection Division of Environmental Quality Air Pollution Control Permit Program Bureau of Technical Services CN Ø27 Trenton, N. J. 08625

Attention of Mr. E. Choromanski, Chief

Ref: Log # 01-88-2199, APC Plant ID #00098, NJ Stack #084, Air Stripper Conditional Permit (3/2/90 approval date)

Dear Mr. Choromanski,

In letter of April 17, 1990 addressed to Mr. L. Mikolajczyk, Chief, Bureau of New Source Review (with copy to you), we proposed use of a Foxboro 3" vortex flowmeter (Model E83W) coupled to a Foxboro round chart recorder (Model 40) to monitor the flow of water to the referenced air stripper and asked that the DEP indicate acceptability of this system. The conditions imposed on the referenced permit are that:

"2. The maximum pumping rate through the air stripper shall be 220 gallons per minute. A flow meter and continuous recorder acceptable to the Department shall be installed and operated to monitor the flow to the stripper."

Mr. Mikolajczyk has indicated, in letter of May 29, 1990, that he would refer this matter to your Bureau. However, at present we are still awaiting an OK for this system. Because we do not yet have the flowmetering system in place, we are not in a position to implement a second condition imposed upon us in the issuance of the referenced permit, namely, that we sample the water stream to the stripper and use the analysis of this stream in conjunction with the flow rate to obtain (and report to DEP) the VOS flowrate to the stripper. We have asked DEP Enforcement for an extension of time for implementation of that second condition until we are able to obtain DEP (your Group's) system approval and purchase and install the components.

We await your response.

Yours truly

Jack B. Feder Technical Director

cc: W. Bennett

- L. Mikolajczyk, Chief, Bureau of New Source Review, NJ DEP
- G. Danis (Counsel)
- J. Dillon
- D. Space
- B. Sullivan, Regional Enforcement Officer, NJ DEP



State of New Jersey L. ARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY

Bureau of Technical Services CN 411 Trenton, N.J. 08625-0411 (609) 530-4041

December 4. 1990

Mr. Jack B. Feder
Technical Director
Arsynco. inc.
P.O. Box 8
Carlstadt. New Jersey 07072

RE: Air Stripper

Process Monitoring Equipment

APC Plant ID No. 00098

NJ Stack No. 084 Log No. 88-2199

Dear Mr. Feder:

I have received your letter dated November 6, 1990 regarding the above referenced source operation. In order to process and review the proposed process monitoring equipment, we request that you supply the technical brochures for the following equipment.

- a) Foxboro Vortex Flowmeter (Model E83W).
- b) Foxboro Round Chart Recorder (Model 40).

Upon receipt of this data we can proceed with the review of this equipment. A maximum time of two weeks is allowed for such a review when all data has been received.

Finally. I will request that you submit a copy of the permit approval conditions and letter with the data requested above. This will expedite the review of your equipment. Until we have received this information we can not approve the proposed equipment.

If you have any questions, please feel free to call me at (609)-530-4041.

Sincerely.

Edward M. Choromanski, CPM

Chief

Bureau of Technical Services

: Byron Súllivan - MRO





P.O. Box 8 • Carlstadt, N.J. 07072 201-933-2323

January 10, 1991

N.J. Dept. of Environmental Protection Division of Environmental Quality Air Pollution Control Permit Program Bureau of Technical Services CN 027 Trenton, N. J. 08625

Attention of Mr. E. M. Choromanski, Chief

Ref: Log # 01-88-2199, APC Plant ID #00098, NJ Stack #084, Air Stripper Conditional Permit (3/2/90 approval date)

Dear Mr. Choromanski,

In letter of December 4th, 1990 you request that we supply technical brochures for

- a) Foxboro Vortex Flowmeter (Model E83W)
- b) Foxboro Round Chart Recorder (Model 40)

for your review and approval for use in the reference installation.

You also request that we submit a copy of the permit approval conditions and letter along with the above data.

All of these are attached to this letter.

Yours truly

Jack B. Feder

Technical Director

cc: W. Bennett

G. Danis (Counsel)

J. Dillon

D. Space

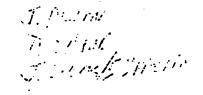
B. Sullivan, Regional

Enforcement Officer, NJ DEP



State of New Jersey ARTMENT OF ENVIRONMENTAL PROTECT. DIVISION OF ENVIRONMENTAL QUALITY

Bureau of Technical Services CN 411 Trenton, N.J. 08625-0411 (609) 530-4041



January 30. 1991

Mr. Jack B. Feder Technical Director Arysnco, Inc. P.O. Box 8

Carlstadt. New Jersey 07072

Re: Air Stripper - Process Monitoring Equipment APC Plant ID No. 00098

NJ Stack No. 084

CT No. 94583 (Log No. 88-2199)

Dear Mr. Feder:

I have received your letter dated January 10, 1991 regarding the above referenced facility. Your letter included the technical specifications of the Foxboro flowmeter and recording system. These items are required to be installed as a condition of approval of Permit No. 94583.

Our review of the proposed process monitoring equipment indicates that they are acceptable. Procedures outlined in your proposal should now be implemented. The recording system should be located in an area which is accessible to the regional enforcement office personnel. The Department reserves the right to require the recorder to be moved if it is not accessible to that office.

If you have any questions, please feel free to call me at (609)-530-4041.

Sincerely,

Edward M. Choromanski, CPM

Chief

Bureau of Technical Services

c: Byron Sullivan - MRO



AIR POLLUTION CONTROL - ATTACHMENT LE

Adjudicatory Hearing Request Checklist and Tracking Form for Enforcement Document(s)

Í. Enforcement Document(s) Being Appealed:

Administrative Order and Notice of Civil Administrative

Title of Enforcement Document(s) Penalty Assessment

July 23, 1991

COG #A911311 MRA, CDS

Issuance Date of Enforcement Document(s)

Document Log Number(s)

Person Requesting Hearing: II.

Arsynco, Inc.

Name

Foot of 13th Street

Carlstadt, NJ 07072

Address

Kerby, Cooper, English, Danis, Popper & Garvin Gary F. Danis, Esq.

Name of Attorney, if applicable Donna M. Russo, Esq. 480 Morris Avenue

Summit, NJ 07901

Address of Attorney

- The following information must be submitted upon requesting an adjudicatory III. hearing:
 - The date the alleged violator received the enforcement document being Α. contested:
 - В. A list of all issues being appealed;
 - An admission or denial of each of the findings of fact, or a C. statement of insufficient knowledge;
 - ۵. The defenses to each of the findings of fact in the enforcement document:
 - Information supporting the request; ٤.
 - F. An estimate of the time required for the hearing;
 - G. A request, if necessary, for a barrier-free hearing location for physically disabled persons;
 - Н. A clear indication of any willingness to negotiate a settlement with the Department prior to the Department's processing of your hearing request to the Office of Administrative Law:
 - I. THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFORMATION LISTED ABOVE, INCLUDING ATTACHMENTS SHALL BE SUBMITTED TO:
 - 1. Donald F. Patterson, Assistant Director, Environmental Enforcement, Division of Environmental Quality, CN 027 Trenton. New Jersey 08625-0027
 - 2. Richard J. McManus, Director, Office of Legal Affairs CN 402 Tranton, New Jersey 08625-0402 (w/o attachments)
 - J. If there are any questions please contact Mr. Michael Osvai, Section Chief, Bureau of Enforcement Services, at (609) 984-4080.

			<u></u>	
IV.	Signature:		Date:	
•				



New Jersey Department of Environmental Protection Division of Hazardous Waste Management 2 Babcock Place West Orange, N.J. 07052 (201) 669-3960

NOTICE OF VIOLATION

ID NO. 110 644688 935	DATE 4/24/50
NAME OF EACILITY ATTS YNO ME.	
LOCATION OF FACILITY COM OC 13-4	ST CARLSTON T VJ 0707 Z
NAME OF OPERATOR	
TO AND THE OF THE PARTY OF THE	
You are hereby NOTIFIED that during my inspec	ation of your facility on the above date, the following
violation(s) of the Solid Waste Management Act,	(N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C.
	ne Spill Compensation and Control Act. (N.J.S.A.
	7:1E-1 et sed.) promulgated thereunder were observed.
These violation(s) have been recorded as part o	f the permanent enforcement history of your facility.
DESCRIPTION OF VIOLATION 7726	-9-1(a) Aus prosport Tramps
Proses - 9.46,8	Vo soul faill
-7-7 has que car	of plan - dee so alless
hardy west 570	
Chan dial address the sections must	
Remedial action to correct these violations must	
Within	fifteen (15) days of receipt of this Notice of Violation, you
shall submit in writing to the investigator issuing	this notice at the above address, the corrective
	The issuance of this document serves as notice to you
	de the State of New Jersey, or any of its agencies from
The same of the sa	from assessing penalties, with respect to this or other
violations. Violations of these regulations are pu	nishable by penalties of \$50,000 per violation.

Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

New Jersey Department of Environmental Protection Division of Hazardous Waste Management 2 Babcock Place West Orange, N.J. 07052 (201) 669-3960



NOTICE OF VIOLATION

ID NO. h10 04464495	DATE 4/21/90
NAME OF FACILITY AGSTALE INC-	
LOCATION OF FACILITY FOR UP 15 -4	ST CAPCITANT NT GOOTE
NAME OF OPERATOR DENNIS SENET	Crosse monage
You are hereby NOTIFIED that during my inspecti	on of your facility on the above date, the following
violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C.
7:26-1 et seq.) promulgated thereunder and/or the	
58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:	1E-1 et seq.) promulgated thereunder were observed.
These violation(s) have been recorded as part of t	he permanent enforcement history of your facility.
DESCRIPTION OF VIOLATION VS 1/a	23.11 (c) DISCHARGE OF HAZERS
	Mar retirestion of Dissiperior
	The State of the S
151,4D 15434D	SAMPLES THEN 1/10/50
	A STATE OF THE STA
CON OR MINICE PROVIETS	avia D Garany
Remedial action to correct these violations must be	e initiated immediately and be completed by
Remedial action to correct these violations must be within fift	e initiated immediately and be completed by teen (15) days of receipt of this Notice of Violation, you
Remedial action to correct these violations must be	e initiated immediately and be completed by teen (15) days of receipt of this Notice of Violation, you
Remedial action to correct these violations must be within fiff shall submit in writing, to the investigator issuing to	e initiated immediately and be completed by teen (15) days of receipt of this Notice of Violation, you
Remedial action to correct these violations must be within fift shall submit in writing, to the investigator issuing to measures you have taken to attain compliance. The state of the investigator issuing to the investigator is the investigato	e initiated immediately and be completed by teen (15) days of receipt of this Notice of Violation, you his notice at the above address, the corrective
Remedial action to correct these violations must be within fift shall submit in writing, to the investigator issuing to measures you have taken to attain compliance. To that a violation has occurred and does not preclude	e initiated immediately and be completed by teen (15) days of receipt of this Notice of Violation, you his notice at the above address, the corrective he Issuance of this document serves as notice to you
Remedial action to correct these violations must be within fift shall submit in writing, to the investigator issuing to measures you have taken to attain compliance. That a violation has occurred and does not preclucinitiating further administrative or legal action, or find the statement of the	e initiated immediately and be completed by teen (15) days of receipt of this Notice of Violation, you his notice at the above address, the corrective he Issuance of this document serves as notice to you let he State of New Jersey, or any of its agencies from rom assessing penalties, with respect to this or other
Remedial action to correct these violations must be within fift shall submit in writing, to the investigator issuing to measures you have taken to attain compliance. To that a violation has occurred and does not preclude	e initiated immediately and be completed by teen (15) days of receipt of this Notice of Violation, you his notice at the above address, the corrective he Issuance of this document serves as notice to you let he State of New Jersey, or any of its agencies from rom assessing penalties, with respect to this or other
Remedial action to correct these violations must be within fift shall submit in writing, to the investigator issuing to measures you have taken to attain compliance. That a violation has occurred and does not preclucinitiating further administrative or legal action, or find the state of the	e initiated immediately and be completed by teen (15) days of receipt of this Notice of Violation, you his notice at the above address, the corrective he Issuance of this document serves as notice to you let he State of New Jersey, or any of its agencies from rom assessing penalties, with respect to this or other

Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

5/15/50

15045



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

May 17, 1990

Hr. Thomas Brady NJ Department of Environmental Protection Division of Hazardous Waste Management Metro Bureau of Field Operations 2 Babcock Place West Orange, NJ 07052

Reference: Notice of Violation - 4/24/90

Dear Mr. Brady:

The violations cited are:

N.J.A.C:7:26-9.4 (G) No Personnel Training We do have a written personnel training program and the two people who handled hazardous waste are trained. have begun the training of the other member of our emergency team. . The Bergen County Fire Academy is doing the training with the first session on May 5 and the next on May 25, 1990.

N.J.A.C:7:26-9.4 (G)8 No Semi-Annual Drill Semi-Annual Drill will be held.

N.J.A.C:7:26-9.7 Inadequate Contingency Plan Does not address hazard waste storage area. understanding that this refers to the fact that our hazardous waste area is not clearly shown on the facility drawing. We will clearly show the hazardous waste area in the facility drawing.

If there are any questions, please call or write.

Sincerely yours,

Werley Bennett Wesley Bennett

Manager

Regulatory Affairs



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

May 30, 1990

Mr. Thomas Brady Metro Bureau of Field Operations 2 Babcock Place West Orange, NJ 07952

Reference: NOV - Dated 4/24/90

Issued 5/15/90

Dear Mr. Brady:

Arsynco, Inc. is in receipt of the Notice of Violation with attached analytical results of soil samples.

At the outset, I would like to state that Arsynco, Inc. is committed to take all appropriate measures to remediate any environmental contamination at its facility.

We have examined each of the four areas indicated to have solvents in the ground from the analysis. In only one of these areas is Arsynco, Inc. aware of a discrete spill subject to notification. This is in the area of Sample Oll, where a spill occurred a year ago. This was in fact reported under log #DWM-89-05-17-1255 to the Department. The sources of the other three areas of contamination are unknown and therefore could not have been reported.

Arsynco, Inc. intends to immediately solicit help from environmental consultants to further delineate the contaminated areas and locate any specific sources. In particular, we will immediately examine the area of Sample 009 to see if any emergency remedial measure can be taken.

Arsynco, Inc. will contact you within a few days to further discuss your requirements and set up a meeting with you.

Thank you for your cooperation in this matter.

Very truly yours,

James Dillon

Vice President and

Corporate Environmental and Regulatory Affairs Manager

PD

cc: D. Space, W. Bennett, J. Feder Arsynco, Inc.

Rec. 8/29/90





State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

CN 028 Trenton, N.J. 08625-0028 (609) 633-1408 Fax # (609) 633-1454

2 2 AUG 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arsynco, Inc. Foot of 13th St. Carlstadt, N.J. 07072

ATTENTION: Dennis Space, General Manager

Dear Mr. Space:

There is enclosed for service upon Arsynco, Inc. is an ADMINISTRATIVE ORDER AND NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT issued by the New Jersey Department of Environmental Protection pursuant to the provisions of the Solid Waste Management Act.

The Department is available to meet with the principals of the case to discuss the enclosed enforcement document. Should you desire such a meeting please contact Margaret Elsishans within 20 calendar days of receipt of this letter. This does not affect the time frame within which you may request an administrative hearing, under the Notice of Right to a Hearing provisions of the enclosed document.

Should you have any questions concerning this matter, please contact Margaret Elsishans at (609) 633-0700.

Sincerely,

Wayne C. Howitz

Assistant Director

Hazardous Waste Enforcement

CAL C. How

WCH/mte Enclosure(s)

cc Health Department
Mayor's Office
Bureau of Compliance and Technical Services
Regional Field Office





State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT

CN 028 Trenton, N.J. 08625-0028 (609) 633-1408 Fax # (609) 633-1454 2 2 AUG 1990

IN THE MATTER OF

Arsynco, Inc.

Foot of 13th St.

Carlstadt, N.J. 07072

ADMINISTRATIVE ORDER

AND .

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

This Administrative Order and Notice of Civil Administrative Penalty Assessment is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (hereinafter "NJDEP" or the "Department") by N.J.S.A. 13:1D-1 et seq., and the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and duly delegated to the Assistant Director for Enforcement of the Division of Hazardous Waste Management pursuant to N.J.S.A. 13:1B-4.

FINDINGS

- The Department has determined that Arsynco, Inc. (hereinafter "Arsynco") is a generator of hazardous waste and a hazardous waste facility (EPA ID# NJD044688935) as defined in N.J.A.C. 7:26-1.4 and is located at Block 91, Lot 1, Foot of 13th St., Carlstadt, Bergen County, State of New Jersey.
- 2. During an inspection conducted by a Department representative on April 24, 1990, the following violations were observed:
 - a. Arsynco failed to have a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under N.J.A.C. 7:26-9.4(g)6ii.
 - b. Arsynco failed to keep records that document that the training or job experiences required under N.J.A.C. 7:26-9.4(g)1 through 5 have been given to, and completed by, facility personnel, in violation of N.J.A.C. 7:26-9.4(g)6iv.
 - c. Arsynco failed to hold semi-annual drills involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures, in violation of N.J.A.C. 7:26-9.4(g)8.

- d. Arsynco failed to have the contingency plan describe the actions facility personnel shall take to comply with N.J.A.C. 7:26-9.7(a), (b) and (e) and in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility, in violation of N.J.A.C. 7:26-9.7(c).
- e. Arsynco failed to have the contingency plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency service, pursuant to N.J.A.C. 7:26-9.6(f), in violation of N.J.A.C. 7:26-9.7(e).
- 3. Based on the facts set forth in these FINDINGS, the Department has determined that Arsynco has violated the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and the regulations promulgated pursuant thereto, N.J.A.C. 7:26-1 et seq., specifically N.J.A.C. 7:26-9.4(g)6iii, 9.4(g)6iv, 9.4(g)8, 9.7(c), and 9.7(e).

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED THAT ARSYNCO SHALL:

- 4. Within fifteen (15) calendar days after receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment, comply with the following provisions which were found to be in non-compliance during the inspection noted in paragraph two (2) above: N.J.A.C. 7:26-9.4(g)6iii, 9.4(g)6iv, 9.4(g)8, 9.7(c), and 9.7(e).
- 5. Within twenty (20) calendar days upon receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment submit the enclosed VERIFICATION OF COMPLIANCE by certified mail, return receipt requested or by hand delivery to the address below, indicating that you have complied with the provisions referenced in paragraph four (4) above.

New Jersey Department of Environmental Protection Division of Hazardous Waste Management Bureau of Compliance and Technical Services CN 028 Trenton, NJ 08625 Attention: Margaret Elsishans

THIS ORDER SHALL BE EFFECTIVE UPON RECEIPT.

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

- 6. Pursuant to N.J.S.A. 13:1E-9e and N.J.A.C. 7:26-5.4(g), and based upon the above FINDINGS, the Department has determined that a civil administrative penalty should be assessed against Arsynco in the amount of \$8,000.00.
- 7. Payment of the penalty is due when a final order is issued by the Commissioner subsequent to a hearing, if any, or when this Notice of Civil Administrative Penalty Assessment becomes a final order (see following paragraph). Payment shall be made by certified check payable to "Treasurer, State of New Jersey" and shall be submitted to:

New Jersey Department of Environmental Protection Division of Financial Management Planning and General Services Bureau of Revenue CN 402 Trenton, NJ 08625

8. If no request for a hearing is received within twenty (20) calendar days from receipt of this Notice of Civil Administrative Penalty Assessment, it shall become a final order upon the twenty-first calendar day following its receipt and the penalty shall be due and payable.

NOTICE OF RIGHT TO A HEARING

9. Pursuant to N.J.S.A. 52:14B-1 et seq. and N.J.S.A. 13: 1E-9, Arsynco is entitled to an administrative hearing. Any hearing request shall be delivered to the address below within twenty (20) calendar days from receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment.

Assistant Director for Enforcement
Division of Hazardous Waste Management
401 East State Street
CN 028
Trenton, New Jersey 08625
Attention: Wayne C. Howitz, Assistant Director

- 10. Pursuant to N.J.A.C. 7:26-5.3 Arsynco shall, in its request for a hearing, furnish NJDEP with the following:
 - a. The name, address, telephone number and EPA identification Number (if applicable) of the violator and its authorized representative;
 - b. The violator's defenses, to each of the Department's findings of fact in the findings section of the administrative order or notice of civil administrative penalty assessment, stated in short and plain terms;

- c. An admission or denial of each of the Department's findings of fact in the findings section of the administrative order or notice of civil administrative penalty assessment. If the violator is without knowledge or information sufficient to form a belief as to the truth of a finding, the violator shall so state and this shall have the effect of a denial. A denial shall fairly meet the substance of the findings denied. When the violator intends in good faith to deny only a part or a qualification of a finding, the violator shall specify so much of it as is true and material and deny only the remainder. The violator may not generally deny all of the findings but shall make all denials as specific denials of designated findings. For each finding which the violator denies, the violator shall allege the fact or facts as the violator believes such fact or facts be;
- d. Information supporting the request and specific reference to or copies of all written documents relied upon to support the request;
- e. An estimate of the time required for the hearing (in days and/or hours) and;
- f. A request, if necessary, for a barrier-free hearing location for disabled persons.

GENERAL PROVISIONS

- 11. Neither the issuance of this Administrative Order and Notice of Civil Administrative Penalty Assessment nor anything contained herein shall relieve Arsynco of the obligation to comply with applicable laws, including but not limited to the statutes and rules cited herein.
- 12. This Administrative Order and Notice of Civil Administrative Penalty Assessment is binding on Arsynco, its agents, successors, assigns, any trustee in bankruptcy or other trustee, and any receiver appointed to a proceeding in law or equity.
- 13. Notice is given that violations of any statutes, rules or permits other than those herein cited may be cause for additional enforcement actions, either administrative or judicial. By issuing this Administrative Order and Notice of Civil Administrative Penalty Assessment the Department does not waive its right to initiate additional enforcement actions.
- 14. Obligations and penalties of this Notice of Civil Administrative Penalty Assessment are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and the protection of the public health, safety, and welfare and are not

Arsynco, Inc. Page 5

intended to constitute debt or debts which may be limited or discharged in a bankruptcy proceeding.

- 15. Notice is given that pursuant to N.J.S.A. 13:1E-9e, the Department is authorized to assess a civil administrative penalty of not more than \$50,000 for each violation, and each day during which the violation continues constitutes an additional, separate and distinct offense.
- 16. Notice is further given that any person who violates the provisions of N.J.S.A. 13:1E-1 et seq. or any code, rule, or regulation promulgated pursuant thereto shall be liable to a penalty of not more than \$50,000 per day to be collected in a civil action, and any person who violates an administrative order issued pursuant to 13:1E-9c or a court order issued pursuant to N.J.S.A. 13:1E-9d, or who fails to pay a civil administrative penalty in full after it is due is subject upon order of a court to a civil administrative penalty not to exceed \$100,000 per day of such violations.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:

Wayne C. Howitz

Assistant Director

Mazardous Waste Enforcement

WCH/mte



P.O Box 8 • Caristadt, N.J. 07072 201 - 933 - 2323

September 13, 1990

Ms. Margaret Elsishans
NJDEP
Division of Hazardous Waste Management
Bureau of Compliance and Technical Service
CN 028
401 East State Street
Trenton, NJ 08625

Reference: Letter of August 22, 1990

Administrative Order and Notice of Civil

Administrative Penalty Assessment

Dear Ms. Elsishans:

On Wednesday, September 12, 1990, I called you concerning the above Administrative Order. We went over the violations that were cited by a department representative on April 24, 1990. As I explained to you on the phone, we think that our contingency plan and emergency procedure contain many of the things in the plan and procedures that we were cited for not having. We agreed that the parts of the plan and procedures, that we have and were cited for not having, would be sent to you and Thomas Brady at the Metro Office. Enclosed you will find the requested information.

Under Findings of Administrative Order #2 (b) -- In our conversation I told you that our people are trained to work with all chemicals (hazardous and non-hazardous) as required by OSHA's Right To Know Laws. We do not receive hazardous waste from off site. In dealing with on site hazardous waste, our people were trained under OSHA's Right To Know Law about chemicals in the work place. We would gladly send you a copy of our Right To Know Manual if you would like to have a copy.

Under Findings of Administrative Order #2 (c) -- During our conversation it was agreed that at the time of the inspection we had failed to hold semi-annual drills. We did have a drill in May, 1990 involving all employees and the fire officals from Carlstadt, NJ. At the time of the inspector's visits, these plans were already formulated.

We understand that if we cannot resolve this matter before September 18, 1990, we must write requesting an Administrative hearing. If there are any questions or more information is needed, please feel free to call.

Sincerely yours,

Wesley Bennett

Manager

Regulatory Affairs

PD

cc: Mr. Thomas Brady
Bureau of Compliance and Technical Services
2 Babcock Place
West Orange, New Jersey 07052

Enclosure



P.O Box 8 • Caristadt, N.J. 07072 201 - 933 - 2323

September 17, 1990

Assistant Director for Enforcement Division of Hazardous Waste Management 401 East State Street CM-028 Trenton, NJ 08625

Attention: Wayne C. Norowitz

Assistant Director

Reference: Letter of August 22, 1990

Administrative Order

Request for an Administrative Hearing

Dear Sir:

Pursuant to N.J.A.C. 7:26-5.3, Arsynco shall, in its request for a hearing, furnish NJDEP with the following:

A. Name:

Address:

Arsynco, Inc.

Foot of 13th Street Carlstadt, NJ 07072

Telephone:

EFA Identification No.:

Authorized Rep:

(201) -933 - 2323

NJD044688935

James Dillon

B. <u>Violations</u>

1. Arsynco failed to have a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under N.J.A.C. 7:26-9.4 (G) Gi, in violation of N.J.A.C.7:26-9.4 (G) iii.

Written description of training is in our Contingency Plan and Emergency Procedures.

2. Arsyndo failed to keep records that document that the training or job experiences required under N.J.A.C. 7:26-9.4 (G) 1-5 have been given to, and completed by, facility personnel in violation of N.J.A.C. 7:26-9.4 (G) 6 IV.

page 2.

(4) The period of noncompliance, including exact date and time.

On Friday, March 10th, 1989, at 2:45 p.m. our continuous LEL meter alarm went off (it is set to go off at 4% LEL). The LEL meter reading went to 12% in 10 minutes and began to drop right away. The LEL meter reading was back below 5% within 2 hours.

(5) The cause of the noncompliance;

The terms in our permit from Bergen County Utilities Authority concerning LEL are any two readings of 5% or one reading of 10% must be reported. When we reported the high LEL reading on Friday, March 10th, 1989, the only process water we were discharging at that time to our treatment pit was process water that may have contained Methanol. reported that the high LEL was caused by this process water. On Monday we took an LEL reading on the samples that we had taken and kept sealed in the refrigerator, the LEL reading was only 6%. Based on this and other results that we have gotten by checking the reading on our continuous LEL meter with the results from our portable LEL meter, leads us to believe that the reported 12% LEL reading was not a true reading.

(6) Steps being taken to reduce, eliminate and prevent reoccurrence of the noncomplying discharge.

In the third quarter of 1988 we installed a continuous LEL meter to monitor our discharge to the sewer system and subsequently to B.C.U.A. The sensor was placed in the manhole of the sewer line as specified by B.C.U.A. The LEL meter worked fine for the first month but we have had trouble with the sensor ever since. In fact we have gone through three sensors in the last six months. We have discussed each replacement with the manufacturer of the LEL meter. Eact time they have made suggestions that seem to solve the discrepancies in the readings for a while. The last time we talked to the manufacturer we were told that the sensor should not get

In Arsynco's Contingency Plan and Emergency Procedures is a list of job titles and each job title has its qualifications when a man is promoted to a job after being trained he is given 22 days to see if he can do the job. We do have records of these promotions.

3. Arsynco failed to hold semi-annual drills involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the Contingency Plan and Emergency Procedure.

Arsynco had a drill in May, 1990 involving all employees and the local fire offical from Carlstadt, NJ to test our emergency response capabilities.

4. Arsynco failed to have the contingency plan describe the actions facility personnel shall take to comply with N.J.A.C. 7:26-9.7 (A), (B) and (E) and in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility in violation of N.J.A.C. 7:26-9.7 (C).

Ansynco Contingency Plan and Emergency Procedures do describe the action facility personnel shall take to comply with N.J.A.C. 7:26-9.7 (A), (B) and (E) and in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility in violation of N.J.A.C. 7:26-9.7 (C).

5. Arsynco failed to have the contingency plan describe arrangements agreed to by local police department, fire department, hospitals, contractors and state and local emergency response teams to coordinate emergency service, pursuant to N.J.A.C. 7:26-9.6 (T) in violation of N.J.A.C. 7:26-9.7(D).

In Arsynco Contingency Plan and Emergency Procedure, we have letters from the local police, fire, and hospital saying that they had received copies of our Contingency Plan and Emergency Procedures. A copy was also sent to our local Emergency Coordinator. We are a member of our local Emergency Planning Council, we have been a member ever since the council was formed.

It is estimated that the hearing will take less than four hours. A barrier-free hearing location is not necessary.

We are making this request for an Administrative hearing pursuant to N.J.S.A. 52:145-1 et seq. and N.J.S.A. 13:18-9 which states that any hearing request shall be made within twenty days from receipt of the Administrative Order and Motice of Civil Administrative Penalty Assessment.

We have talked to Ms. Margaret Etsishans and have sent her the information that she requested. If we can come to a mutual agreement, a hearing will not be necessary.

Sincerely yours,

Wesley Bennett

Manager

Regulatory Affairs

PD

co: Ms. Margaret Elsishans

H.J.D.E.P.

Division of Mazardous Wasto Management

Bureau of Compliance and Technical Services

CN023

401 East State Street

Trenton, NJ 08625



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

LANCE R. MILLER, DIRECTOR

CN 028 Trenton, N.J. 08625-0028 (609) 633-1408 Fax # (609) 633-1454

12 APR 1091

CE D.K. 3.11

CERTIFIED MAIL\ RETURN RECEIPT REQUESTED

IN THE MATTER OF:

Arsynco, Inc. Foot of 13th Street Carlstadt, New Jersey 07072

RE: ADMINISTRATIVE ORDER AND NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT DATED AUGUST 22, 1990, ACTION #HM-008-91

Attention: Wesley Bennett, Manager Regulatory Affairs

Dear Mr. Bennett:

The Department of Environmental Protection has completed its review of your request dated September 9, 1990, for an adjudicatory hearing on the above referenced matter. The Department hereby grants the request for an adjudicatory hearing.

By referring your hearing request to the Office of Administrative Law, the Department does not waive its right to contest the introduction or consideration of any defenses or issues which it believes to be inappropriately raised.

Please contact Margaret Elsishans at (609) 633-0700 if you have any questions concerning this matter.

Assistant Director

Hazardous Waste Fhforcement

WCH/mte



State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY CN 027

Trenton, N.J. 08625-0027 (609) 633-7288 Fax #: (609) 984-9658



Donald F. Patterson, Assistant Director Environmental Enforcement

August 23, 1990

Mr. Gary F. Danis Kerby, Cooper, English, Danis, Popper & Garwin 480 Morris Avenue Summit, New Jersey 07901-1583

Re: Arsynco, Inc.

Carlstadt, New Jersey

New Jersey Administrative Code 7:27-8.3(a) and (b)
Administrative Order and Notice of Civil
Administrative Penalty Assessment with Log #A880363 MRA, CDS)
dated April 20, 1988

Dear Mr. Danis:

This is in response to your letter dated April 27, 1988, and to confirm the subsequent telephone message of August 6, 1990 from Ms. Gloria DeSousa of my staff, concerning the referenced Administrative Order.

As the result of an investigation conducted on March 18, 1988, the Department determined that Arsynco, Inc. ("Arsynco") installed and operated a Croll Reynolds packed tower air stripper without obtaining an approved Permit to Construct and Certificate to Operate. Arsynco's Permit to Construct and Certificate to Operate application, with log #86-1123, was denied on March 7, 1988, and thus resulted in this violation of N.J.A.C. 7:27-8:3(a) and (b).

After further review, the Department determined that the original Permit to Construct and Certificate to Operate application, with log #86-1123 was denied in error, when in fact, it should have been approved. Subsequently, Arsynco reapplied and the Department's Bureau of New Source Review approved the application. In light of this, the Department hereby rescinds the referenced Administrative Order and Notice of Civil Administrative Penalty Assessment, effective immediately. The \$400.00 penalty assessment need not be remitted.

Mr. Gary F. Danis August 23, 1990 Page 2

If you have any further questions, please contact Ms. DeSousa at (609) 984-4308.

Sincerely,

larold E. Christiff, Chief

Bureau of Enforcement Service

HEC/GD:jt

c: E. Greene

M. Makler

G. DeSousa

B. Sullivan (MRO)



State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WATER RESOURCES CN 029 TRENTON, NEW JERSEY 08625

NOTICE OF VIOLATION			
DATE OCT 30, 19 90 METRO ENFORCEMENT ELEMENT BUREAU OF REGIONAL ENFORCEMENT TELEPHONE NO. 20/0 6 9-390			
TYPE PCWS # SUPPLY NIPDES # CO3C970 DISCH RCRA# NAME OF FACILITY Acstocology Stare f MUN. (Artifal f County Ecages) LOCATION OF FACILITY For of 13 to 5 to 6 f MUN. (Artifal f County Ecages) FACILITY REPRESENTATIVE AND TITLE Mai, En i A. Iffolifo, C.			
You are hereby NOTIFIED that during an inspection of your facility on the above date, the following violations were noted and remedial actions are required:			
DESCRIPTION OF VIOLATION/REMEDIAL ACTION: JOHN HOW KARPIS IN YAAR AREA FARILTY HAS NOT CHTANER A BRYSICAL CENTRETIC. TRANST IN ARCORDANCE WITH NEW TRISEY WATER ACT NTAC FILE I AS THIS ESSUE WAS NOTED IN NEW 1888 AND MAY OF 1989 - SEIN, FAMILY			
be opplied Fin			
The above noted violations are in violation of the following N.J. Statutes/Regulation, and will be recorded as part of the permanent enforcement history of your facility:			
New Jersey Water Pollution Control Act (N.J.S.A. 58:10A-1 et seq.) and appropriate Regulations. New Jersey Safe Drinking Water Act (N.J.S.A. 58:12A-1 et seq.) and appropriate Regulations. New Jersey Water Supply Management Act (N.J.S.A. 58:1A-1 et seq.) and appropriate Regulations. New Jersey Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) and appropriate Regulations. New Jersey Underground Storage of Hazardous Substance Act (N.J.S.A. 58:10A-21 et seq.) and appropriate Regulations.			
Remedial action to correct the violations must be initiated immediately. Within five (5) calendar days of receipt of this Notice of Violation, you shall telephone the investigator issuing this notice at the above number with the corrective measures you have initiated to attain compliance. The issuance of this document serves as notice to you that the Department has determined that a violation has occurred and does not preclude the State of New Jersey or any of its agencies, from initiation of further administrative or judicial enforcement action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are subject to penalties of up to \$25,000 per day.			
Further enforcement action, which will require a written response, may be issued on these violation(s) and any additional violations found during the inspection.			
Investigator, Division of Water Resources, DEP CIMALIES A. DIELLY Violation received by Social Canada Special			

White - Original

Canary - Bureau File

Pink - Criminal Justice

Goldenrod - Central File





State of New Tersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF WATER RESOURCES METRO BUREAU OF REGIONAL ENFORCEMENT

2 BABCOCK PLACE WEST ORANGE, NEW JERSEY 07052

(201) 669-3900

December 26, 1990

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Wesley Bennett Manager, Regulatory Affairs Arsynco, Incorporated P.O. Box 8 Carlstadt, New Jersey 07072

Re: NJDEP Correspondence dated December 19, 1990.

Dear Mr. Bennett:

On October 30, 1990, representatives of the Division of Water Resources (DWR) conducted a Compliance Evaluation Inspection of the Arsynco facility in Carlstadt, New Jersey. During this inspection, a Notice of Violation (NOV) was issued for your facility's failure to install the backflow prevention devices requested by the Hackensack Water Company and for failing to obtain a Physical Connection Permit from the Bureau of Safe Drinking Water. This Permit is required since the facility is supplied by both well water and municipal water lines.

The Department hereby directs Arsynco Incorporated to consult with the Hackensack Water Company, install the backflow prevention devices, and obtain the required Physical Connection Permit. Information regarding this permit may be obtained from Mr. James Montgomery of the Bureau of Safe Drinking Water at (609) 292-5550. Please submit a written report, detailing the status of your permit application, within fourteen (14) days from receipt of this letter to:

Janet Budesa Carroll, Acting Supervisor
Surface Water Unit
Metro Bureau of Regional Enforcement
NJDEP - Division of Water Resources
2 Babcock Place
West Orange, N.J. 07052

Failure to comply with this directive will result in appropriate enforcement action pursuant to N.J.S.A. 58:10A-1 et seq.

If you have any questions pertaining to the above, please contact Charles A. Berry of this office at (201) 669-3900.

Very truly yours,

Janet Budesa Carroll

Acting Supervisor

Surface Water and Sewer Extensions Metro Bureau of Regional Enforcement

Ruden Canoll

E30:E:

c: Chief, Permits Administration Branch, USEPA

Mr. Patrick M. Durach, USEPA

Mr. Leonard Vena, H.O.

Ms. Theresa Treadwell, Hackensack Water Co.

Mr. James Montgomery, BSDW

CO D.S., D. I. EN



State of New Tersev DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF WATER RESOURCES

CN 029 Trenton, N.J. 08625-0029

Office of the Director

(609) 292-1637 Fax # (609) 984-7938

February 1, 1991

Arsynco, Inc. P.O. Box 8 Carlstadt, N.J. 07072

Wesley Bennett, Mgr. Regulatory Affairs

RE: Original Physical Connection Permit # 868

Dear Mr. Bennett:

We have pleasure in enclosing herewith an Original Physical Connection Permit which is being issued by this Department in accordance with the provisions of N.J.S.A. 58:12A-1 et seq., N.J.S.A. 58:11-9.1 et seq., and N.J.A.C. 7:10-10.1 et seq.

Your attention is particularly drawn to the expiration date and to the conditions with which you must comply before the next renewal can be affected. In connection with this, we suggest that you make immediate arrangements with the local health and/or water authorities for the required witnessing of the four quarterly pressure tests to be conducted each quarter between April 1 and March 31, and, if required, an internal inspection conducted within six months of the next application for renewal.

To facilitate your recording the results of these tests and inspection, we are also enclosing two copies of the renewal application. Upon completion of the last test during the first quarter 1992 and certification by your local authorities, this form and a check made payable to Treasurer State of New Jersey in the amount of \$200.00 should be forwarded to this Bureau before MARCH 31, 1992. Should you have any questions, you may call me at (609) 292-5550.

Sincerely,

James R. Montgomery

Physical Connection Program Bureau of Safe Drinking Water

JRM: PC2 Enclosures

CC: Hackensack Water Company Mid-Bergen Reg Hlth Comm

New Jersey is an Equal Opportunity Employer

Recycled Paper



STATE OF NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION CN 402

Trenton, N.J. 08625





The New Jersey Department of Environmental Protection grants this permit in accordance with your application, attachmen accompanying same application, and applicable laws and regulations. This permit is also subject to the further condition and stipulations enumerated in the supporting documents which are agreed to by the permittee upon acceptance of the permittee Permit No. Issuance Date Effective Date **Expiration Date** February 1, 1991 868 February 1. 1991 March 31, 1992 Location of Activity/Facility Name and Address of Owner Name and Address of Applicant Arsynco, Inc. Same as Applicant Foot of 13th Street P.O. Box 8 Carlstadt, N.J. 07072 Carlstadt Borough Issuing Division
WATER RESOURCES Type of Permit Statute(s) N.J.A.C. 7:10-Application No. ORIGINAL PERMIT : PHYSICAL CONNECTION 10.1 et seq.

This permit grants permission to:

Maintain, own or operate a Physical Connection between an approved Public Community Water Supply and an unapproved water supply at the above named location, in consideration of the renewal application received January 28, 1991.

Number. Type(s) and size(s) of Devices installed - One 3/4 inch & two 2 inch RPBPs

Owner of Approved Public Water Supply - Hackensack Water Company

Source of Unapproved Water Supply - Private Well

This Permit is Subject to the Following Specific Conditions:

- 1. The approved physical connection(s) is (are) tested for tightness under prevailing pressure conditions at least every three months. (N.J.A.C. 7:10-10.6(a)1.)
- 2. The approved physical connection(s) is (are) subjected to an internal inspection, if required, within six months prior to the application for renewal of the permit. (N.J.A.C. 7:10-10.6(a)2.)
- 3. The owner of the approved physical connection(s) shall arrange for the witnessing of these quarterly pressure tests and annual internal inspections with the owners of the Public Community Water Supply and/or the Local Board of Health. Such tests, conducted solely by a representative or employee of the owner of the approved physical connection(s), are not acceptable. (N.J.A.C. 7:10-10.6(b))
- 4. The Local Board of Health and the owner of the Public Community Water Supply which are affected certify that the approved physical connection(s) is (are) funtioning properly. (N.J.A.C. 7:10-10.5(b)3)

cc: Hackensack Water Company Mid-Bergen Reg Hlth Comm

Approved by the Department of Environmental Protection

FEB 61 1991

Barker Hamill, Chief

Bureau of Safe Drinking Water

This permit is subject to the following general conditions:

- 1. This permit is revocable, or subject to modification or change, at any time, when in the judgement of the Department of Environmental Protection of the State of New Jersey such revocation, modification or change shall be necessary.
- 2. The issuance of this permit shall not be deemed to affect in any way action by the Department of Environmental Protection of the State of New Jersey on any future application.
- 3. The works, facilities and/or activities shown by plans and/or other engineering data, which are this day approved, subject to the conditions herewith established, shall be constructed and/or executed in conformity with such plans and/or engineering data and the said conditions.

1 . .

- 4. No change in plans or specifications shall be made except with the prior written permission of the Department of Environmental Protection of the State of New Jersey.
- 5. The granting of this permit shall not be construed to in any way affect the title or ownership of property, and shall not make the Department of Environmental Protection or the State a party in any suit or question of ownership of property.
- 6. This permit does not waive the obtaining of Federal or other State or local government consent when necessary. This permit is not valid and no work shall be undertaken until such time as all other required approvals and permits have been obtained.

House the same of the transfer of the transfer

the Property of the Commission of the Property of the contract

The second form of the second control of the property of the second seco

A The Allies of the Allies of

en verschiede in der entrementen verschiede in der entrementen verschiede in der entrementen verschiede in der

Presidente de la company de la company de la company de la company de la company de la company de la company d La company de la company de la company de la company de la company de la company de la company de la company de La company de la company de la company de la company de la company de la company de la company de la company de

grante - Broke Barrier James & Johnson

o grant transcriptor experience entrance encountries and experience encountries.

The control of the control of the following states on the control of the control

The Toronton of Toronton of the State of the

1.

Control of the second of the

Electric Contract Ingresion of the contract of

The state of the Court of the C

tin' tartati 🕠

7. A copy of this permit shall be kept at the work site, and shall be exhibited upon request of any person.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY BUREAU OF EMERGENCY RESPONSE FIELD NOTICE OF VIOLATIONS

CASENO: 18 03 73-7519-16	DATE //S / LUCE AND LESS
CASE NAME ARSYNCO INC	
INCIDENT LOCATION FT 0/ /3/	ST. CARLSTADT NITHORAND
RESPONSIBLE PARTY ADDRESS ARSYNO	20 1NC
A POB	CX 8, CARLSFADT NIEDOLOGI
RESPONSIBLE PARTY REPRESENTATIVE	mes f DILLON - VI JOHN
You are hereby NOTIFIED that during an investigation by	DEP on the above date, the following violations of New Jersey
	nas been recorded as part of a permanent enforcement history
	priate Division with a recommendation that formal enforcement
action be taken.	
[] NJSA 58:10-23.11	SPILL: COMPENSATION AND CONTROL AGE
NJSA 23:5-28	POLLUTION AND OBSTRUCTION OF WATER
NJAC 7:26—	HAZARDOUS WASTEREGULATIONS
De Cornes Pelleh	
DESCRIPTION OF VIOLATION	10-23. 11. E NOV
Friture to NoTiFy THE	
HOTECTON - WICKER USING	
TAR AND VALVE RELEASING	
Within days of receipt of this notice, you sh	all submit in writing, to the address and investigator indicated
below, an account of the incident and corrective measure	
	Investigator Soscoh & Hoyles
Jupí	Address 2 BABUOCK PLACE STATE
	MEST DRAGES WAR
COPIES: White - File Yellow	- Investigator Pink - Responsible Party
COPIES: White File Yellow	- Investigator Pink - Responsible Party



March 27th, 1991

Mr. Joseph E. Hoyle Jr.
New Jersey Department of
Environmental Protection
Bureau of Emergency Response
No. 2 Babcock Place
West Orange, New Jersey 07052

RE: Case No. 91-03=13-1519-18
Written Report of Incident
NJSA: 58:10-23.11 E-Spill
Compensation and Control Act

- I. Arsynco, Inc.
 Foot of 13th Street
 Carlstadt, New Jersey 07072
- II. Same as above
- III. Tuesday, March 12th, 1991 at 10:30 P.M. Accidental Discharge of a mixture of Salt water and xylene into bldg. #6 spill control drainage trench occurred initiating the emergency procedure for containment and clean up of oil and chemicals spills.
 - IV. Approximately 1500 gallons of Salt (NaCl) Water and 1500 gallons of Xylene.
 - V. There were no injuries.
 - VI. There were no actual or potential hazards to human health or the environment as a result of the discharge to the plant containment system. Procedures as specified in the Arsynco Spill Prevention Plan were initiated and affectively prevented the discharge of any hazardous material to the municipal sanitary sewer system.
- VII. The discharge was confined to the area immediately under H-600 (3000 gal mixing/settling tank) in bldg. #6, the spill control drainage trench from bldg. #6 to the effluent treatment basin and the effluent treatment basin.

VIII. On Tuesday March 12th at approximately 10:30 P.M.

George Ghattas, the 2nd Shift Production Supervisor was operating a forklift truck in the door way of Building #6 when the top of the truck accidentally hit the bottom valve on a 3000 gallon mixing/settling tank (H-600), breaking the nozzle above the valve and releasing salt water onto the truck and concrete floorwinto the spill control drainage trench situated under the tank. Mr. Ghattas recognizing that the tank contained a xylene phase floating above the salt water phase, immediately shut off the ignition on the truck and started washing down the truck and floor with water, directing the wash into the drainage trench.

At approximately 10:35 P.M. another production Supervisor, Humberto Armella, telephoned Mr. Jim Dillon, the Corporate Environmental & Regulatory Affairs Manager and described the incident. Jim Dillon told Mr. Armella to continue to wash down the area, making sure to direct all liquid into the spill control drainage trench. Mr. Dillon advised Mr. Armella that he would be at the plant in approximately 10 minutes and in the interim he (Mr. Armella) should call Mr. Wesley Bennett (Environmental Consultant) and receive instructions for implementing the spill control plan for preventing immiscible liquids (xylene) from entering the municipal sewer line.

At approximately 10:50 P.M. Jim Dillon arrived at the plant and went immediately to the effluent basin area and observed that the spill control plan was in effect. George Ghattas and two operators were preparing drums for storage of xylene as it was separated from the basin by skimming equipment. He (Jim Dillon) checked to see that all the equipment designed to handle the situation was in working order and advised Mr. Ghattas to immediately take a one (1) quart sample of the liquid flowing from the discharge of the last compartment of the basin to the municipal sewer line and have it brought to the Quality Control (Q.C.) Lab. He (Jim Dillon) then went to Bldg. #6 to observe the situation.

In Bldg. #6 he found that liquid was still flowing out the broken nozzle on H-600 and Mr. Armella was washing it into the drainage trench with a fire hose. Jim Dillon told Mr. Armella to take a quart sample of the

VIII. (continued)

discharge from H-600 and have an operator bring it into Q.C. Lab. He (Jim Dillon) then went up to the 2nd floor and checked the volume in H-600: the tank was approximately 1/3 full. Since there was no way to seal off the broken nozzle and stop the flow without endangering someone, he advised Mr. Armella to continue as directed with the water wash to the drainage trench and went to the Q.C. Lab to check the above mentioned samples and focus attention on containment at the effluent basins.

At approximately 11:00 P.M. Jim Dillon started to qualitatively examine the samples. The sample of the discharge from H-600 was xylene i.e., immiscible with water; characteristic xylene odor. The sample of liquid from the flow into the municipal sewer indicated no xylene was present (i.e., one phase, completely miscible with water, no characteristic xylene odor), demonstrating that no xylene was going into the municipal sewer line.

At approximately 11:05 P.M. Jim Dillon instructed George Ghattas to take a quart sample from each of the 6 compartments in the effluent basin in order to obtain a profile of the xylene distribution in the basin. He also instructed Mr. Ghattas to continually take samples from the discharge compartment to the municipal sewer system and notify him immediately if there was any evidence of xylene, i.e., 2 phase and/or characteristic xylene odor.

At approximately 11:15 P.M. Jim Dillon went to Bldg.#6 and noticed that no more xylene was flowing out of H-600. Mr. Armella told him that the tank has just emptied. Jim Dillon advised Mr. Armella to flush the drainage trench with water until he (Jim Dillon) got back to him. Jim Dillon went back to the Lab. (Bldg. #7) and proceeded to check the samples (7) which G. Ghattas had taken from the effluent basin. Xylene was evident in samples from the first 4 compartments - there was no xylene evident in samples from the last 2 compartments nor was there any evident in the sample from the discharge to the municipal sewer line. He (Jim Dillon) then instructed Mr. Ghattas and Mr. Livingston (3rd shift supervisor - who arrived on the scene at approximately 11:15) to continue to drum off any xylene collected from the "skimmer"tank (1000 gal. capacity) and continue to monitor (sample) the 6 compartments and discharge line to the municipal sewer for xylene and notify him (J.D.) if any xylene is evident after the 4th compartment. He also instructed them to continue to flush the drains in Bldg. #6 with water and

VIII. (continued)

go back to normal water flow from the manufacturing areas to the basin. (It had been cut back earlier to decrease the flow across the basin.) He explained to them that this would maintain a high level in the effluent basin and insure against xylene entering the municipal sewer line since flow from each compartment to the next, comes from outlets near the bottom of the compartments and this would contain the xylene in the basin until it was all "skimmed" into the storage tank and drummed.

At approximately 11:30 P.M. a total of ≈ 600 of wet xylene had been drummed off from the Holding Tank. Samples from the 5th and 6th compartments and discharge to the municipal sewer line still indicated no xylene was present. At approximately 11:45 a total of ≈ 1200 gal. of wet xylene had been drummed off and there was no change in the samples from the 5th and 6th compartments or the discharge line to the municipal sewer, i.e., no xylene was present. Monitoring of the 5th and 6th compartments and the discharge line continued until approximately 1:45 A.M. 3/13/91 with no xylene evident past the 4th compartment. A total of ≈ 1700 gal. of wet xylene was drummed off at this time. Intermittent samples were also taken from the first 4 compartments over this period to monitor the removal of xylene. no xylene present in any of the compartments at 2:00 A.M., the contents of the basin had returned to normal, and a total of 21750 gal. of xylene had been separated and drummed off. At approximately 8:30 A.M. an additional 350 gals. of wet xylene was drummed off from the skimmer tank for a total of 2100 gals. of wet xylene containing approximately 600 gals. of water.

IX. Item VIII above describes the measures taken to eliminate the problem caused by the discharge. On 3/23/91 an "In Plant Forklift Truck Operator Training Program" (scheduled prior to this incident) was conducted by a representative of the NJ State Safety Council. Fifteen (15) Arsynco employees were in attendance, including the operator of the truck causing the incident. The incident was reviewed and discussed in conjunction with other safety procedures presented at the session.

JAMES P. DILLON
V.P./ENVIRON. & REG. AFFAIRS MANAGER

cc: D.S., W.B., J.F., L.C.

P.H. Esq., J.S. Envir. Conslt.

A.S. DEP.

J.T.-B.C.DHS

J.M.-BCUA

R.M.-CARLSTADT FIRE DEPT.

T.H. - LEC

New Jersey Department of Environmental Protection Division of Hazardous Waste Management 2 Babcock Place West Orange, N.J. 07052 (201) 669-3960



NOTICE OF VIOLATION

ID NO. 110 049688533	DATE 4 7, 15,91
NAME OF FACILITY asympto Inc	
LOCATION OF FACILITY FORT 1 13 EX	St., Carlotado
NAME OF OPERATOR Dennis Some	Plu Mgs
You are hereby NOTIFIED that during my inspection o violation(s) of the Solid Waste Management Act, (N.J.	
7:26-1 et seq.) promulgated thereunder and/or the Spi	., -
58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1	
These violation(s) have been recorded as part of the p	
DESCRIPTION OF VIOLATION NJ SA 5	8-10-23.11 @ Discharges
	to properly identify and clearify
	- Storing processing, and Corpsing
	ester in a momen which course or
may come unsuthrajed de	
Remedial action to correct these violations must be in	itiated immediately and be completed by
Mus 4 1881 Within lifteer	(15) days of receipt of this Notice of Violation, you
shall submit in writing, to the investigator issuing this	notice at the above address, the corrective
measures you have taken to attain compliance. The is	ssuance of this document serves as notice to you
that a violation has occurred and does not preclude th	ne State of New Jersey, or any of its agencies from
initiating further administrative or legal action, or from	assessing penalties, with respect to this or other
violations. Violations of these regulations are punisha	ble by penalties of \$50,000 per violation.

Investigator, Division of Hazardous Waste Management Department of Environmental Protection

New Jersey Department of Environmental Protection Division of Hazardous Waste Management 2 Babcock Place West Orange, N.J. 07052 (201) 669-3960



NOTICE OF VIOLATION

ID NO. 1/P. 044 688935	DATE_God 7/1591
NAME OF FACILITY argues One	
LOCATION OF FACILITY FORT 1 3 d	to Cultado
NAME OF OPERATOR Denne Space	
You are hereby NOTIFIED that during my inspection	of your facility on the above date, the following
violation(s) of the Solid Waste Management Act, (N.	J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C.
7:26-1 et seq.) promulgated thereunder and/or the S	Spill Compensation and Control Act, (N.J.S.A.
58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:18	-1 et seq.) promulgated thereunder were observed.
These violation(s) have been recorded as part of the	permanent enforcement history of your facility.
mindequate contamen; -9.4 (cl)4 (-12.1(a) Operations a strange	Tailing to obtain detailed analyses. (d) I Storing hanger dans waster (4 (d) 2 Failing to transfer wests from management yeartering; and disjoined facility without A and part B parts appliestion,
Remedial action to correct these violations must be	initiated immediately and be completed by
May 4, 1991 Within tifte	en (15) days of receipt of this Notice of Violation, you
shall submit in writing, to the investigator issuing thi	
measures you have taken to attain compliance. The	issuance of this document serves as notice to you
that a violation has occurred and does not preclude	the State of New Jersey, or any of its agencies from
initiating further administrative or legal action, or tro	m assessing penalties, with respect to this or other
violations. Violations of these regulations are punish	hable by penalties of \$50,000 per violation.

Investigator, Division of Hazardous Waste Management
Department of Environmental Protection



P. O. Box 6 • Carlstadt, N. J. 07072 201-933-2323

April 17, 1991

Mr. Thomas Brady
Investigator
New Jersey Department of
Environmental Protection
Division of Hazardous
Waste Management
2 Babcock Place
West Orange, NJ 07022

Dear Mr. Brady:

Re: 1.D. # NJD 044688935 Notice of Violation Dated April 4, 1991

Arsynco, Inc. has always made a sincere effort to comply with all environmental laws and regulations. However, the situation is dynamic and we are constantly working to upgrade our facility and procedures. As a result of your visit on April 4, 1991, we received a Notice of Violation from the Division of Hazardous Waste Management dated April 4, 1991. In response we offer the following:

1. 9.4(b)l Failing to obtain detailed analysis of wastes before storage

All materials on site are raw materials, intermediates, finished products, or specific streams from processes used in manufacturing at Arsynco, Inc. The identity of these streams and their contents are known to us, therefore, it is unnecessary to analyze these known materials. Once any of these streams or chemicals is determined to be a hazardous waste for Arsynco, Inc., these are appropriately labeled and moved to our hazardous waste storage area. Inaddition, see Item # 7 of this reply.

2. 9.4(d)1 Storing hazardous wastes in inadequate containers

All hazardous wastes that are packaged at Arsynco, Inc. are put in DOT approved containers. In addition, see item #6 of this reply.

3. 9.4(d)2 Failing to transfer waste from such containers

As stated, DOT approved containers are used and, therefore,

there is no need for any transferring of hazardous wastes. When in the event, a material is determined to be a hazardous waste and it is not in an acceptable container, it is always repackaged and then stored in our hazardous waste storage area. In addition, see item #6 of this reply.

4. 9.4(d)4 Improper management of containers

All hazardous waste that is packaged at our facility is placed in our hazardous waste storage area and the drums managed consistent with the applicable regulations.

5. 12.1(a) Operating a storage and disposal facility without first submitting a part A and part B permit application

A Part A Permit Registration was filed by Arsynco, Inc. in 1980 requesting status as a generator, storage and disposal facility. Since approximately 1985, we have been classified as "Interim Status". We have submitted a closure plan to have our facility re-classified as a generator only.

6. NJSA 58-10-23.11 (c) Discharges of hazardous substances, various and assorted leaking containers

We acknowledge the presence of hazardous substances in drums at Arsynco, Inc. Some of these containers have deteriorated from their excellent original condition mainly due to the effects of the weather. We are in the process of re-packaging any materials in deteriorated containers into sound drums.

7. NJAC 7:26-8.5 (a) Failing to properly identify and classify wastes on site

All of the hazardous wastes on sitehave been properly identified and classified and are stored in our hazardous wastes storage area. There are some drums of raw materials and intermediates on the property which have lost their identity because the labeling has deteriorated. We have had a program and will continue with this program to identify and re-label these unknowns.

8. 9.2(9)2 Storing, processing, disposing, and handling of hazardous wastes in a manner which causes or may cause unauthorized discharges of pollutants.

We do not store, process, or dispose of hazardous wastes in a manner which may cause unauthorized discharges. All materials classified as hazardous wastes are maintained in secure drums in our hazardous waste storage area.

Sincerely yours,

James Dillon

Vice President/Corporate Environmental and Regulatory Affairs Manager

JD/1t

cc: D. Space

W. Bennett

P. Herzberg

J. Sorge

A. Schiff - DEP



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF GAME AND WILDLIFE FORGE P. HOWARD DIRECTOR PLEASE REPLY TO: CN 400 TRENTON, N.J. 08625-0400 FAX #: 1-609-984-1414

Mr. James Dillon Arsynco, Inc. PO Box 8 13th St. Carlstadt, NJ 07072 12Apr91 (L8910409-2)

Dear Sir:

On 21Mar91 and subsequent dates, personnel of the Dept. of Environmental Protection and other agencies conducted an investigation of a hazardous substance discharge by your facility to a nearby creek.

This incident is a violation of New Jersey Environmental Law. A Notice of Violation is attached. Deputy Attorney General Neil Magnus, Dept. of Law & Public Safety, CN-112, Trenton, N.J., 08625 (609-292-1568) may be contacted regarding this Notice.

Very truly yours,

Paul Blankenhorn

Lt., Bureau of Law Enforcement

cc els was



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

PROTECTION

GAME AND WILDLIFE

CORGE P. HOWARD

DIRECTOR

PLEASE REPLY TO: CN 400 TRENTON, N.J. 08625-0400 FAX #: 1-609-984-1414

DATE: 12Apr91

Mr. James Dillon Arsynco, Inc. PO Box 8 13th St. Carlstadt, NJ 07072

NOTICE OF VIOLATION

Dear Sir:

Investigation by personnel of this Division found your firm to be in violation of N.J.S.A. 23:5-28 by virtue of a spill et al.

N.J.S.A. 23:5-28

"No person shall put or place into, turn into, drain into or place where it can run, flow, wash or be emptied into, or find its way into any of the fresh or tidal waters within the jurisdiction of this State, any petroleum products, debris, hazardous, deleterious, destructive or poisonous substances of any kind... A person violating this section shall be liable to a penalty of not more than \$6,000 for each offense. If the violation is of a continuing nature, each day during which it continues shall constitute an additional, separate and distinct offense."

The statute permits the State to compromise and settle any claim. An offer of compromise in this matter is made to you in the amount of \$6,000.00

You are reminded that the statute has been interpreted to impose strict liability upon the responsible party.

Should you decide to accept this offer, payment must be received not later than 13May91 in the form of a money order or certified check drawn to the order of the New Jersey Division of Fish, Game & Wildlife. This is to be sent to Mr. Robert McDowell, Director, Division of Fish, Game & Wildlife, CN=400, Trenton, N.J., 08625 and a copy of your cover letter is to be sent to me at the Northern Region Office, Box 383, Rt. 173 West, RR 1, Hampton, N.J., 08827.

In the event this matter is not settled in the time specified, action will be taken to refer the matter to the Deputy Attorney General to initiate prosecution for the maximum amount as provided by law.

This proposal of settlement is without prejudice as to the State's position in the event this settlement is unacceptable to you.

The issuance of this document and the payment of the compromise and settlement shall deemed to be a compromise and settlement of NJSA 23:5-28 only.

Sincerely,

Lt. Paul Blankenhorn

cc: R. McDowell, Director, Division of Fish, Game and

Wildlife N. Magnus, DAG

R. Winkel, Deputy Chief, Law Enforcement

BER1

BCOEM, BCHD C HD, FD, PD STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Division of Water Resources
Management Services Element
Bureau of Information Systems
CN 029
TRENTON, NEW JERSEY 08625

IIH 10 1991

JUN 03 1991

ARSYNCO INC PO BOX 8 FOOT OF 13TH ST CARLSTADT NJ 07072

RE: Violation of Effluent Limits or Parameter Reporting Requirements of NJPDES Permit on Discharge Monitoring Report. NJPDES Permit No: NJ0030970

Dear Permittee:

The 'Water Pollution Control Act' (hereinafter 'The Act'), N.J.S.A. 58:10A-1 et seq. prohibits the discharge of pollutants, except in conformity with a valid New Jersey Pollutant Discharge Elimination System (hereinafter 'NJPDES') permit pursuant to N.J.A.C. 7:14A-1 et seq.. The Department has issued this facility a permit in accordance with the Act. Your facility was provided an opportunity to comment on the draft permit in accordance with N.J.A.C. 7:14A-8.1. Your facility has been on notice of the requirements of the permit since the final permit was issued.

The Department has determined that your facility is in violation of the 'Water Pollution Control Act' and the implementing regulations (N.J.A.C. 7:14A-1 et seq.) by failing to comply with the following permit condition:

Your Discharge Monitoring Report (DMR) for the period ending 91/04/30 indicated that you are not complying with certain effluent limitations or parameter reporting requirements specified in your permit (see enclosure).

According to the conditions of your permit, it is required that you provide the State and the Regional Administrator with a report concerning any apparent non-compliance, action taken to correct it, and action to be taken to prevent continuation or recurrence of the situation.

Please note that if you are required to monitor and report the parameters Copper, Chromium, or Zinc only if these pollutants are used in water treatment, you must submit your DMR with Code = 'E' in the appropriate sample measurement block(s) if these pollutants are not being used in order to assure that violation notices are not produced.

In accordance with N.J.S.A. 58:10A-10.d. and the NJPDES Regulations, specifically N.J.A.C. 7:14-8.5 and 8.9, failure to comply with the NJPDES Permit effluent limits or to submit complete DMR's, respectively, subjects this facility to civil administrative penalties of up to \$50,000 per day per violation, including MANDATORY civil administrative penalties effective July 1, 1991 pursuant to amendments to the Act for Serious Violations, for Significant Non-Compliance Violations, and for failure to submit effluent parameter information within 10 days of receipt of this letter.

Please note that nothing shall preclude the Department from assessing penalties if the missing DMR effluent parameter information was not inadvertently omitted or if the Department was not notified within 30 days of the DMR due date of the existence of extenuating circumstances beyond the control of the permittee.

Furthermore, N.J.S.A. 58:10A-10.f. provides that any person who negligently violates the Act shall, upon conviction, be guilty of a crime of the fourth degree, and shall be subject to a fine of not less than \$5,000 nor more than \$50,000 per day of violation, or by imprisonment, or by both. Any person who purposely, knowingly, or recklessly violates the Act shall, upon conviction, be guilty of a crime of the third degree as a minimum and shall be subject to a fine of not less than \$5,000 nor more than \$75,000 (\$250,000 if the violation causes a significant adverse environmental effect) per day of violation, or by imprisonment, or by both.

If there is a discrepancy between the DMR information you submitted and the violations listed in the enclosure or you have not already submitted the required non-compliance report, please submit the information to me immediately at the address below.

Very truly yours,

Peter T. Lynch, Chief.

Metro Bureau of Regional Enforcement 2 Babcock Place West Orange, NJ 07052-5504

Enclosure

MJPDES Number: NJ0030970 Facility Name: ARSYNCO INC

Monitoring Period End Date: 91/04/30 Pipe Num: 001A Mon. Loc.: 1

Parameter: 01034 Description: CHROMIUM, TOTAL (AS CR)

VIOLATION: E41 LIMITED, CONCENTRATION ABSENT

Concentration Quantity Average Maximum Minimum Average Maximum

MEASUREMENT: °0.0000 0.0000 0.0000

0.0000

0.0000

0.0000

Monitoring Period End Date: 91/04/30 Pipe Num: 001A Mon. Loc.: 1

Parameter: 01042 Description: COPPER, TOTAL (AS CU)

VIOLATION: E41 LIMITED, CONCENTRATION ABSENT

Concentration Quantity

Average Maximum Minimum Average Maximum MEASUREMENT: 0.0000 0.0000 0.0000 0.0000 0.0000

Monitoring Period End Date: 91/04/30 Pipe Num: 001A Mon. Loc.: 1

Parameter: 01092 Description: ZINC, TOTAL (AS ZN)

VIOLATION: E41 LIMITED, CONCENTRATION ABSENT

0.0000

MEASUREMENT:

Concentration Quantity Average Maximum Minimum Average Maximum

0.0000 0.0000 0.0000

CE 11.5, 4.10.



P.O. Box 8 • Carlstadt, N. J. 07072 201-933-2323

June 5, 1991

Mr. Peter S. Lynch, Chief
Metro Bureau of Regional Enforcement
Department of Environmental Protection
Division of Water Resources
2 Babcock Place
West Orange, NJ 07052-5504

Dear Mr. Lynch:

Re: Letter of June 3, 1991 - Violation of Effluent limits or Parameters Reporting Requirements of NJPDES Permit on Discharge Monitoring Report NJPDES Permit # NJ0030970 Pyre # 001H

This letter of June 3,1991 states that our Discharge Monitoring Report (DMR) for the period ending 91/04/30 indicated that we are not complying with certain effluent limitations or parameters reporting requirements specified in our permit. Our permit states that if no water treatment is used, it is not necessary to monitor for Chromium, Copper, and Zinc. It is stated in our application for our permit that no water treatment chemicals are used. The make-up water for our recirculation pond comes from a deep well and the water is used for non-contact cooling and as stated, the water is not treated in any way.

We have been filling in the space on the DMR for Chromium, Copper, and Zinc with N/A. We were not notified that if no water-treatment was being used that the space in the DMR for these metals should have been filled in using "Code E". We will start using "Code E" with the June report.

Based on the above information, we are requesting that these violations be taken off of our record. If there are any questions, please feel free to call or write.

Sincerely yours,

Wesley Bennett
Wesley Bennett

Manager, Regulatory Affairs



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY CN 027, TRENTON, NJ 08625

JULY 23, 1991

Donald F. Patterson, Assistant Director Environmental Enforcement

IN THE MATTER OF ARSYNCO INC. FOOT OF 13TH STREET CARLSTADT, NJ 07072 LOG #A911311 MRA, CDS ADMINISTRATIVE ORDER AND

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (the "Department") by N.J.S.A. 13:1D-1 et seq., and the Air Pollution Control Act. N.J.S.A. 26:2C-1 et seq. (the "Act"), and duly delegated to the Assistant Director for Enforcement of the Division of Environmental Quality pursuant to N.J.S.A. 13:1B-4.

FINDINGS

1. As the result of an investigation conducted on June 11, 1991, the Department has determined that at your facility located at Foot of 13th Street, Borough of Carlstadt, Lot(s) 1, Block(s) 91, County of Bergen, State of New Jersey, (ID #00098), you used the equipment and/or control apparatus associated with Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit") and Certificate(s) to Operate Control Apparatus or Equipment ("Certificate") without fulfilling all conditions and provisions of the Permit(s) and Certificate(s) #94583, in violation of N.J.A.C. 7:27-8.3(e)1 by failing to submit quarterly air stripper water contaminant reports to the Department for the five reporting periods between January 1, 1990 and March 31, 1991.

ORDER

2. NOW, THEREFORE, IT IS HEREBY ORDERED THAT on or before August 6, 1991 you cease operation of the equipment listed in Paragraph 1 above or operate said equipment in accordance with the above Permit(s) and Certificate(s).

PENALTY

3. Based upon the above FINDINGS, and a review of the entire matter, the Department hereby assesses a Civil Administrative Penalty against you in the amount of \$ 60,000.00. Payment must be submitted to the Department within twenty (20) calendar days of receipt of this Order and Notice unless you request a hearing in accordance with the provisions of Paragraph 4 below. Payment must be made to the Department at the address stated on the enclosed "Enforcement Invoice".

GENERAL PROVISIONS

- 4. Pursuant to N.J.S.A. 26:2C-14.1 you are entitled to a hearing if aggrieved by this Order and Notice. Application for such a hearing must be received by the Department within twenty (20) calendar days from receipt of this Order and Notice. In applying for such hearing, you must furnish the Department with the information listed in Section III of Attachment 1E. If no request for a hearing is received within twenty (20) calendar days, this Notice shall become a final Order and the Penalty will then become due and payable. A hearing request does not stay the terms or effect of this Order.
- 5. The provisions of this Order and Notice shall be binding on you, your principals, agents, employees, successors, assigns, tenants and any trustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 6. No obligations imposed by this Order and Notice, with the exception of Paragraph 3, are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety and welfare.
- 7. Pursuant to N.J.S.A. 26:2C-19 and N.J.A.C. 7:27A-3.12, the Department may, in addition to any civil administrative penalty assessed, amend such penalty assessment to include a civil administrative penalty for the economic benefit (in dollars) which a violator has realized as a result of not complying, or by delaying compliance with this Act.
- 8. Pursuant to N.J.S.A. 26:2C-19(b) and N.J.S.A. 26:2C-19(d), any person who violates the provisions of the Act, or any code, rule regulation or order promulgated or issued pursuant thereto, or who fails to pay a civil administrative penalty in full, shall be liable to a penalty of not more than \$10,000 for the first offense, not more than \$25,000 for the second offense, and not more than \$50,000 for the third and each subsequent offense.
- 9. Pursuant to N.J.S.A. 26:2C-19(f)1 any person who purposely or knowingly violates the provisions of the Act, or any code, rule, regulation, administrative order or court order promulgated or issued pursuant thereto, is guilty of a crime of the third degree.

ARSYNCO INC. A911311 PAGE 3

10. Pursuant to N.J.S.A 26:2C-19(f)2 any person who recklessly violates the provisions of the Act, or any code, rule, regulation, administrative order or court order promulgated or issued pursuant thereto, is guilty of a crime of the fourth degree.

Dated: July 23, 1991

Donald F. Patterson, Assistant D Environmental Enforcement

CERTIFIED MAIL

Adjudicatory Hearing Request Checklist and Tracking Form for Enforcement Document(s)

	of Enforcement Document(s)
Issua	nce Date of Enforcement Document(s) Document Log Number(s)
Perso	on Requesting Hearing:
Name	Name of Attorney, if appli
	
Addre	Address of Attorney
The fine fine fine fine fine fine fine fin	Following information must be submitted upon requesting an adjudicing: The date the alleged violator received the enforcement document
•	contested;
B. C.	contested; A list of all issues being appealed; An admission or denial of each of the findings of fact, statement of insufficient knowledge; The defenses to each of the findings of fact in the enforce
c. •	A list of all issues being appealed; An admission or denial of each of the findings of fact, statement of insufficient knowledge;
с. D.	A list of all issues being appealed; An admission or denial of each of the findings of fact, statement of insufficient knowledge; The defenses to each of the findings of fact in the enford document;
C. D. E. F.	A list of all issues being appealed; An admission or denial of each of the findings of fact, statement of insufficient knowledge; The defenses to each of the findings of fact in the enfordocument; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing location physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your h
C. D. E. F. G.	A list of all issues being appealed; An admission or denial of each of the findings of fact, statement of insufficient knowledge; The defenses to each of the findings of fact in the enfordocument; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing location physically disabled persons; A clear indication of any willingness to negotiate a settlemen
C. D. E. F. G.	A list of all issues being appealed; An admission or denial of each of the findings of fact, statement of insufficient knowledge; The defenses to each of the findings of fact in the enford document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing location physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your herequest to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFOR
C. D. E. F. G.	A list of all issues being appealed; An admission or denial of each of the findings of fact, statement of insufficient knowledge; The defenses to each of the findings of fact in the enford document; Information supporting the request; An estimate of the time required for the hearing; A request, if necessary, for a barrier-free hearing location physically disabled persons; A clear indication of any willingness to negotiate a settlement the Department prior to the Department's processing of your harequest to the Office of Administrative Law; THIS FORM, COMPLETED, SIGNED AND DATED WITH ALL OF THE INFORT LISTED ABOVE, INCLUDING ATTACHMENTS SHALL BE SUBMITTED TO: 1. Donald F. Patterson, Assistant Director, Environmental Quality, CN 027 Tr

KERBY, COOPER, ENGLISH, DANIS, POPPER & GARVIN

COUNSELLORS AT LAW

480 MORRIS AVENUE

SUMMIT, NEW JERSEY 07901-1583 908-273-1212

RICHARD G. MOSER RONALD J. TELL OF COUNSEL

JERRY FITZGERALD ENGLISH ARTHUR H. CARVIN III HOWARD R POPPER*

RUSSELL T. KERBY, JR.

JOHN W. COOPER

CARY F. DANIS, P.E. FREDI L. PEARLMUTTER* RENEDICT J. MONACHINO: EDWARD L. LARSEN. KRISTI BEYER BRAGG ROBERT M. VREELAND STEPHEN R. GELLER* PETER W ULICNY

FAX 908-273-8922

DONNA M RUSSO** *ALSO ADMITTED IN N.Y. -ALSO ADMITTED IN D.C.

VIA FEDERAL EXPRESS August 12, 1991

Donald F. Patterson Assistant Director Environmental Enforcement New Jersey Department of Environmental Protection Division of Environmental Quality CN 027 Trenton, New Jersey 08625

RE: In the Matter of Arsynco, Inc. Log #A911211/ MRA, CDS

Dear Mr. Patterson:

Along with the Department's Tracking Form for Enforcement Documents, enclosed herewith please find Arsynco's request for an administrative hearing in the above-referenced matter pursuant to Arsynco respectfully requests that the N.J.S.A. 26: 2C-14.1. Department forward this matter to the Office of Administrative Law as a contested case for purposes of conducting an administrative hearing in connection with the Findings and Assessments made in the Administrative Order and Notice of Civil Administrative Penalty Assessment dated June 23, 1991.

Attached and made part of the Hearing Request, also find Arsyco's Exhibits A through H.

Should you have any questions, please do not hesitate to contact me. Please advise as to the date, time and place of the administrative hearing.

Very truly yours,

Donna M. Russo, Esq.

DMR/bjm

cc: Gary F. Danis, Esq.

Jerry Fitzgerald English, Esq.

Jack Fedder, Arsynco, Inc.

Before the State of New Jersey Department of Environmental Protection

Kerby, Cooper, English, Danis, Popper & Garvin 480 Morris Avenue Summit, NJ 07901 (201) 273-1212 Attorneys for Arsynco, Inc.

In the Matter of ARSYNCO, INC.

REQUEST FOR ADMINISTRATIVE HEARING

Arsynco, Inc. ("Arsynco"), pursuant to N.J.S.A. 26:2C-14.1 and N.J.S.A 52:14B-1, et seq. and in response to the Administrative Order and Notice of Civil Administrative Penalty Assessment ("Notice") dated July 23, 1991, by the State of New Jersey Department of Environmental Protection ("the Department" or "NJDEP"), respectfully requests that the Department forward this matter to the Office of Administrative Law for purposes of conducting an administrative hearing in connection with the Findings and Assessments made in the Notice and in accordance with the Administrative Procedure Act as a contested case.

In support thereof, the following is shown:

A. Date Of Receipt Of Enforcement Document
July 25, 1991

B. Issues

- 1. Whether Arsynco used the equipment and/or control apparatus associated with Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit") and Certificate(s) to Operate Control Apparatus or Equipment ("Certificate") without fulfilling all conditions and provisions of the Permit(s) and Certificate(s) #94583, in violation of N.J.A.C. 7:27-8.3(e)1 by failing to submit quarterly air stripper water contaminant reports to NJDEP for the five reporting periods between January 1, 1990 and March 31, 1991.
- 2. Whether the amount of the civil administrative penalty assessed by the Department against Arsynco is proper and not excessive.

C. Admissions and Denials

With regard to the enumerated Finding, Arsynco states as follows:

- 1. Admit that the Arsynco facility is located at the Foot of 13th Street, Borough of Carlstadt, Lot 1, Block 91, County of Bergen, State of New Jersey (ID #00098).
- 2. Admit that an investigation of the facility was conducted by the Department on June 11, 1991.
- 3. Admit that Arsynco used the equipment and\or control apparatus associated with Permit(s) to Construct, Install or Alter

Control Apparatus or Equipment ("Permit") and Certificate(s) to Operate Control Apparatus or Equipment ("Certificate").

This finding constitutes a conclusion of law and not an averment of fact to which an answer may be deemed to be required, but insofar as an answer may be deemed to be required, denies that Arsynco is in violation of N.J.A.C. 7:27-8.3(e)1 by failing to submit quarterly air stripper water emissions reports to the Department for the five reporting periods between January 1, 1990 and March 31, 1991 and further asserts that it is inequitable for the Department to assess any penalties because Arsynco timely submitted its specifications for flow monitoring equipment, requesting an approval of a flow meter and continuous recorder from the Department, in accordance with the terms and conditions of Air Stripper Permit and Certificate #94583. The Department did not respond to Arsynco's request for approval of the flow monitoring equipment until more than nine (9) months after the initial request and thereby caused Arsynco's inability to report air stripper data to NJDEP.

D. Defenses

1. The installation of the stripper was required by the NJDEP Division of Water Resources to meet Arsynco's NJPDES-SIU permit requirements.

Arsynco applied for permit to Construct, Install or Alter Control Apparatus or Equipment and Certificate to Operate Control issued. The Bureau of Enforcement Service rescinded both the notice and the penalty (See Exhibit A).

Meanwhile, on March 6, 1990, almost four years after the initial application, NJDEP Division of Environmental Quality, Air Pollution Control Permit Program, Bureau of New Source Review finally approved the second application and issued a conditional Air Stripper Permit (Log # 01-88-2199).

One of the conditions of the permit is the installation of a NJDEP-approved system for measuring and recording the water flow to the stripper. Another condition requires a sampling of the water stream to the stripper and use of the analysis of this stream in conjunction with the flow rate to obtain (and report to NJDEP) the VOS flowrate to the stripper.

On April 17, 1990, Arsynco requested the Bureau of New Source Review of NJDEP the approval of a vortex flowmeter and recorder (See Exhibit B).

On April 18, 1990, Arsynco had notified the West Orange Office of the Bureau of Enforcement Control of the NJDEP of Arsynco's inability to implement the flowmeter installation until the NJDEP approved the metering system. Arsynco requested an extension of time for the implementation to sample and report until Arsynco was able to obtain NJDEP approval, purchase the components and install the system (See Exhibit C).

Apparatus or Equipment (Croll Reynolds packed tower air stripper) as early as March 26, 1986.

The permit was improperly denied on March 7, 1988, almost two years after the application. On April 20, 1988, the Department erroneously determined that Arsynco installed and operated the air stripper without obtaining an approved permit to Construct and Certificate to operate and issued an Administrative Order and Notice of Civil Administrative Penalty Assessment.

A request for an administrative hearing and a request for an informal conference were made on March 29, 1988.

Applications were re-submitted on May 10, 1988 and after a conference with the Air Permit Engineering Branch on September 23, 1988, Arsynco submitted an additional report pertinent to the air permit on November 14, 1988.

The Department did not act upon the hearing request until August 23, 1990, when the Department determined that the Bureau of New Source Review erroneously and improperly denied the original Permit to Construct and Certificate to Operate application.

The NJDEP Bureau of Enforcement Service admitted that the permit should have been approved back in early 1986, the date of the original application. The Department admitted that penalties should not have been assessed and the notice should not have been

On May 29, 1990, NJDEP Bureau of New Source Review recommended that the Bureau of Technical Services review the adequacy of the flowmeter/recorder proposed by Arsynco (See Exhibit D).

On November 6, 1990, Arsynco contacted the NJDEP Bureau of Technical Services to inquire about NJDEP's failure to respond to request for approval of the equipment. Arsynco again reiterated that NJDEP's delay in approving the equipment had caused Arsynco's inability to report air stripper data to NJDEP (See Exhibit E).

On December 4, 1990, NJDEP Bureau of Technical Services responded to Arsynco's November 6, 1990 letter requesting that Arsynco forward the technical brochures for the equipment together with a copy of the permit approval conditions (See Exhibit F).

On January 10, 1991, Arsynco forwarded the requested information to the Bureau of Technical Services (See Exhibit G).

NJDEP Bureau of Technical Services approved the equipment on January 30, 1991 (See Exhibit H). Purchase Order 2416 was issued to Foxboro Corporation, and equipment was purchased on February 7, 1991.

Manufacturer shipped equipment to Arsynco on April 10, 1991. Installation costs estimates were obtained from contractors over the next few weeks.

On May 22, 1991 Purchase Order 2773 was issued to Dominick Kass for installation of the flowmeter and the recorder. On May 27, 1991 contractor began installing the equipment.

The plant shutdown for annual maintenance from June 24, 1991 to July 14, 1991, with major portions of the plant off-line until August 3, 1991.

On July 18, 1991, the contractor completed installation of the flowmeter/controller. On July 19, 1991, flowmeter/recorder brought on-line and waste water flow to the air stripper adjusted to 200 gpm (220 gpm permitted) using a butterfly valve in the line.

On July 31, 1991, samples of waste water to and from the air stripper were taken with current flowmeter reading.

Accordingly, Arsynco asserts that NJDEP is estopped from assessing penalties against Arsynco for alleged non-compliance with the terms and conditions of the Air Stripper Permit and Certificate #94583. NJDEP's continuing failure to timely address the air permit requirements, after Arsynco both asked for an extension of time and timely filed the required documentation, made it impossible for Arsynco to monitor the stack prior to July 1991.

2. NJDEP has failed to set forth the basis for calculating the penalty imposed in the Notice and therefore, Arsynco objects to the imposition of the penalty as excessive.

3. Arsynco reserves its right to assert all other legal and equitable defenses which may become available to it with respect to the development of facts relevant to the Findings.

E. Supporting Information

The Permit to Construct, Install or Alter Control Apparatus or Equipment for Air Stripper Log #01882199, various correspondence between Arsynco and NJDEP, NJDEP decisions, state and federal court opinions, administrative law and other documents or information which may become known to Arsynco.

F. Estimate Of Time For Hearing

Arsynco estimates the hearing may take one (1) day.

- G. Need For A Barrier-Free Hearing Location

 Arsynco does not request a barrier-free hearing location.
- H. Willingness To Negotiate A Settlement

Arsynco is not willing to negotiate a settlement with the Department prior to the Department's processing of this hearing request to the Office of Administrative Law.

Respectfully submitted, Arsynco, Inc.

By:

GARY F. DANIS, ESQUIRE

DONNA M. RUSSO, ESQUIRE

Kerby, Cooper, English, Danis, Popper & Garvin

Its Attorneys

DATED: August 12, 1991 enclosures

EXHIBIT LIST

- Exhibit A August 23, 1990: NJDEP Division of Environmental Quality letter to Arsynco recinding Order Notice Administrative and of Civil Administrative Penalty Assessment of April 20, 1988 because NJDEP erroneously denied Arsynco's original permit application.
- Exhibit B April 17, 1990: Arsynco letter to NJDEP Bureau of New Source Review requesting approval of a vortex flowmeter and recorder.
- Exhibit C April 18, 1990: Arsynco letter notifying NJDEP Bureau of Enforcement Control (West Orange Office) of Arsynco's inability to implement the flowmeter installation until the NJDEP approves the metering system.
- Exhibit D May 29, 1990: NJDEP Bureau of New Source Review Letter to Arsycno recommending that the Bureau of Technical Services review the adequacy of the flowmeter/recorder.
- Exhibit E November 6, 1990: Arsynco letter to NJDEP Bureau of Technical Services to inquire about NJDEP's failure to respond to Arsynco's request for approval of the equipment.
- Exhibit F December 4, 1990: NJDEP Bureau of Technical Services responds to Arsynco's November 6, 1990 letter requesting that Arsynco forward the technical brochures for the equipment together with a copy of the permit approval conditions.
- Exhibit G January 10, 1991: Arsynco letter forwarding requested information to the Bureau of Technical Services.
- Exhibit H January 30, 1991: NJDEP Bureau of Technical Services approves the equipment.

KERBY, COOPER, ENGLISH, DANIS & GARVIN

COUNSELLORS AT LAW

480 MORRIS AVENUE

SUMMIT, NEW JERSEY 07901-1583 JERRY FITZGERALD ENGLISH

908-273-1212

FAX 908-273-8922

RONALD J. TELL STEVEN S. GOLDENBERG* OF COUNSEL

RUSSELL T. KERBY, JR.+

ARTHUR H. GARVÎN IÎI

CARY F. DANIS, P.E.

JOHN W. COOPER

RICHARD G. MOSER 1940-1992

CONFIDENTIAL

ATTORNEY-CLIENT PRIVILEGED INFORMATION -- ALSO ADMITTED IN D.C.

FREDI L. PEARLMUTTER* KRISTI BEYER BRAGG* STEPHEN R. CELLER. PETER W. ULICNY DONNA M. RUSSO** DANIEL JON KLEINMAN*** HOLLY ENGLISH**** MARGARET R. KALAS** MARY T. ZDANOWICZ ROBERT A. MEYERS RICHARD F. IGLAR*

-ALSO ADMITTED IN N.Y ---ALSO ADMITTED IN PA. ----ADMITTED IN MA. ONLY

March 19, 1993

Mr. Jack Feder Arsynco, Inc. P. O. Box 8 Carlstadt, NJ 07072

Administrative Order and RE: Notice of Civil Administrative Penalty Assessment (AOANCAPA), Log #A911311MRA, CDS,

July 23, 1991

Dear Mr. Feder,

In accordance with your telephone request on Friday, March 12, 1993, a file review has been done regarding the disposition of the above referenced matter and to determine if there is another outstanding Notice with a similar number.

The file review indicated that the August 12, 1991 letter this firm wrote to Mr. Donald Patterson, Assistant Director, New Jersey Department of Environmental Protection & Energy contained a typographical error, listing the AOANCAPA as Log #A911211MRA,CDS instead of Log #A911311MRS, CDS. All documentation accompanying the August 12, 1991 letter contained the correct Log number. complete file review indicated no additional Notices or correspondece with any reference to a Log #A911211MRS,CDS.

Enclosed is a copy of the February 18, 1992 letter from NJDEPE rescinding the AOANCAPA. Please accept my apologies for any inconvenice the typographical error may have caused you.

If you have any additional questions reqarding this matter, please contact this office.

Very truly yours,

Gary F. Danis

GFD: lg

(3/23/93: J) 3 Anwer per This Box This Did you

KERBY, COOPER, ENGLISH, DANIS, POPPER & CARVIN

COUNSELLORS AT LAW

480 MORRIS AVENUE

SUMMIT, NEW JERSEY 07901-1583

RICHARD C. MOSER RONALD J. TELL OF COUNSEL

February 26, 1992

FAX: (201)933-5472

908-273-1212

FAX 908-273-8922

JOHN W. COOPER
JERRY FITZGERALD ENGLISH
ARTHUR H. GARVIN III
HOWARD R. POPPER*
GARY F. DANIS, P.E.
FREDI L. PEARLMUTTER*
EDWARD L. LARSEN*
KRISTI BEYER BRAGG*
ROBERT M. VREELAND
STEPHEN R. GELLER*
PETER W. ULICNY
DONNA M. RUSSO**
DANIEL JON KLEINMAN***

RUSSELL T. KERBY, JR.

*ALSO ADMITTED IN N.Y.

"ALSO ADMITTED IN D.C.

"ALSO ADMITTED IN PA.

Mr. Dennis Space Arsynco, Inc. P. O. Box 8 Carlstadt, NJ 07072

RE: Administrative Order and Notice of Civil Administrative Penalty Assessment,
Log # A911311MRA, CDS,
July 23, 1991

Dear Dennis,

Attached is the response to Arsynco's request for a hearing on the referenced matter. I am sending you the original so it will be suitable for framing! It looks like even the DEPE can be embarrassed into admitting it made a mistake. Donna's long recitation of the miserable history of the stripper permitting fiasco paid off.

Let me know if you have any questions.

Very truly yours,

Gary F. Danis

GFD: lg

cc: Donna M. Russo

Jerry Fitzgerald English



State of New Jersey Department of Environmental Protection and Energy

CN 402 Trenton, NJ 08625-0402

Scott A. Weiner Commissioner

February 18, 1992

Ms. Donna M. Russo Counsellor at Law Kerby, Cooper, English, Danis, Popper and Garvin 480 Morris Avenue Summit, New Jersey 07901-1583

Re: Arsynco, Inc.

Carlstadt, New Jersey

New Jersey Administrative Code 7:27-8.3(e)1 Administrative Order and Notice of Civil Administrative Penalty Assessment with Log #A911311 MRA, CDS dated July 23, 1991

Dear Ms. Russo:

This is in response to your letter dated August 12, 1991, concerning the referenced Administrative Order and Notice.

As the result of an investigation conducted on June 11, 1991, the Department determined that Arsynco, Inc. used the equipment and/or control apparatus associated with Permit to Construct and Certificate to Operate #94583 without fulfilling all conditions and provisions of the Permit and Certificate, in violation of N.J.A.C. 7:27-8.3(e)1 by failing to submit quarterly air stripper water contaminant reports to the Department for the five reporting periods between January 1, 1990 and March 31, 1991. Consequently, on July 23, 1991, the Department issued to Arsynco, Inc. the referenced Administrative Order and Notice of Civil Administrative Penalty Assessment in the amount of \$60,000.00.

Ms. Donna M. Russo Arsynco, Inc. Page 2

After further review, the Department has determined that the referenced Administrative Order and Notice were issued in error. Due to an administrative error, the Department failed to address Arsynco's request in a letter dated April 18, 1990, for an extension of time to conduct the analysis required to submit the quarterly air stripper water contamination reports to the Department.

Accordingly, the referenced Administrative Order and Notice are hereby rescinded effective immediately. The \$60,000.00 penalty assessment need not be remitted.

Subsequent to the installation of the flowmeter and recording system, Arsynco has collected grab samples, conducted analysis and submitted quarterly reports to the Department and is thus, currently in compliance with condition #4 of Permit and Certificate #094583.

If you have any further questions, please contact Ms. Mary Durney of my staff, at (609) 292-0640.

Sincerely,

Harold E. Christiff, Chief

Bureau of Enforcement Services

HEC:MMD:did

c: M. Osvai

M. Makler

M. Durney

B. Sullivan

HWM-004C

New Jersey Department of Environmental Protection Division of Hazardous Waste Management 2 Sabcock Place West Orange, N.J. 07052 (201) 669-3960



NOTICE OF VIOLATION

10 NO. NTO 044688935	•	DATE PROPER	31,1882
NAME OF FACILITY ARS THE		<u> </u>	
LOCATION OF FACILITY	13 M	AP 457740T	
NAME OF OPERATOR			<u></u>
•			•
You are hereby NOTIFIED that du		•	•
violation(s) of the Solid Waste Mai			•
7:28-1 et seq.) promulgated theret		•	
58:10-23.11 et seq.) and Regulatk	•		
These violation(s) have been reco	rded as part of the permaner	it enforcement history of	your facility.
	van 4 2 4 2		_
	10N 7:26. 8, 3(4)3		
	TTE XYLAND)		
	TRINSES WITH LOS		
V171,044 - 7,1	(a) MILLING TO	nd IN TAIN ADS BYAT	4/361
S/ MEL 7,7 (6)	6 PALLINE TO ADEL	MATELY RECERD	w col chen)
Remedial action to correct these v	loiations must be initiated im	neclately and be complet	ed by
•		•	
shall submit in writing, to the inves	•	•	-
measures you have taken to attain		•	•
• • • • • • • • • • • • • • • • • • •			_
hat a violation has occurred and d	•	•	
nitiating further administrative or le	. Agent		•
violations. Viciations of these regu		• •	atori
		ssorp y/14/92	
•	•	<i></i>	

Investigator, Division of Hazardous Waste Management Department of Environmental Protection



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

April 30th, 1992

Mr. Thomas Brady NJ Department of Environmental Protection and Energy Div. of Hazardous Waste Management 2 Babcock Place West Orange, NJ 07052

Notice of Violations

Dated: 3/31/92 Issued: 4/14/92

Dear Mr. Brady:

Arsynco Inc. denies all the alleged violations of Regulation 726 described in your notice dated 3/31/92 and issued 4/14/92.

The observations and suggestions you made during your inspection with regard to these alleged violations were addressed and taken care of immediately i.e., on 3/31/92 the day of your inspection.

If you have any questions in regard to this reply, please write or call me at 201-933-2323 Ext. 237.

Sincerely,

James P. Dillon

Vice-President/Reg. Affairs

Manager

amus P Luch

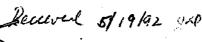
ND ·

cc: D.S.

W.B.

E.I.

J.Fe.





NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY DIVISION OF FACILITY WIDE ENFORCEMENT CN 027, TRENTON, NJ 08625-0027



IN THE MATTER OF ARSYNCO, INC.

P.O. BOX 8

CARLSTADT, NJ 07072

4A420454

ADMINISTRATIVE ORDER AND

NOTICE OF CIVIL ADMINISTRATIVE

PENALTY ASSESSMENT

This ORDER and NOTICE are issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection and Energy (the "Department") by N.J.S.A. 13:1D-1 et seq., and the Air Pollution Control Act, N.J.S.A. 26:2C-1 et seq. (the "Act"), and duly delegated to the Assistant Director, Air and Environmental Quality Enforcement, the Division of Facility Wide Enforcement pursuant to N.J.S.A. 13:1B-4.

FINDINGS

1. As the result of an investigation, the Department has determined that at your facility located at Foot of 13th Street, Boro of Carlstadt, Lot(s) 1, Block(s) 91, County of Bergen, State of New Jersey, (ID #00098), you used the equipment and/or control apparatus associated with Permit(s) to Construct, Install or Alter Control Apparatus or Equipment ("Permit") and Certificate(s) to Operate Control Apparatus or Equipment ("Certificate") without fulfilling all conditions and provisions of the Permit(s) and Certificate(s) #94563, in violation of N.J.A.C. 7:27-8.3(e)1 by emitting Volatile Organic Compounds (VOC) from the air stripper during the fourth quarter of 1991 in quantities which exceeded the permitted allowable emissions as follows:

Sample #	Sample Date	VOC Emiss	ions(1b/hr)
		<u>Actual</u>	Allowable
ì	10/1/91	3.947	2.7
2	11/21/91	3.193	2.7

ORDER

2. NOW, THEREFORE, IT IS HEREBY ORDERED THAT YOU <u>IMMEDIATELY</u> operate the equipment listed in Paragraph 1 in accordance with the above Permit(s) and Certificate(s).



State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY

New Jersey Administrative Code 7:27-8.3(e)1 or (e)2

Permits and Certificates

remarky Calculation Smeet
Date of Violation. See attached
Date of Violation:
Name of Violator: Arsyn(O
Equipment: Hir Stripper
Air Contaminant:
Certificate to Operate 1: 94563
Circle violation:
8(3(e)1) 8.3(e)2
i of sources Less than 10 lbs/hr 10 lbs/hr to 22.8 lbs/hr Greater than 22.8 lbs/hr NSPS, NESHAPS, PSDAQ, EOR, EHS and TVOS Signature of Investigator: Date: 41-92
¥ . ,
For completion by BES:
Offense Number:
Penalty
Pursuant to N.J.A.C. 7:27A-3.10
f of sources x Penalty = Assessment
Less than 10 lbs/hr x $\frac{1}{10}$ = $\frac{5}{12}$ = $\frac{5}{12}$ = $\frac{5}{12}$ = $\frac{5}{12}$ = $\frac{5}{12}$
NSPS, NESHAPS, PSDAQ, x \$ = \$
Total Penalty Assessment \$ /2,670
Signature of Assessor: Lean Check Date: 5/7/2
THIS FORM MUST BE ATTACHED TO CORRESPONDING DEC 013

Department hereby assesses. The Model of the entire action, the Department hereby assesses. The Model that is a five Denaity against you in the a count of \$12,000.00. The section for admitted to the Department within twenty (20) entended days of accordance with the Greek and Notice unless you request a hearing to according with the provisions of Paragraph & below. Pay and must be made to the Department of the address stated on the englosed "EYFORCEMENT INVOICE".

GINERAL PROVISIONS

- Decount to N.I.S.A. 26:20-17.1 year and Malice. Whiten a finite in Its makes in the control by this Order and Malice. Whiten a fine include in Its calculus included by the Popular wet within the days (20) calculus days for each the Popular of Site the Information listed in Section III of Attach est 18. If no request for a bearing is received within twenty (20) calendar days, this Notice shall became a final Order and the Penalty will then become document payable. A boundary request to short stay the forms or effect of this Order.
- 5. The provisions of this Orde, and Notice shall be binding on you, proprincipals, agents, employees, successors, assigns, tennats and outtrustee in bankruptcy or receiver appointed pursuant to a proceeding in law or equity.
- 6. Vo obligations imposed by this Order and Verice, with the exception of Paragraph 1, are intended to constitute a debt, damage claim, penalty of other civil action which should be theited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed prisonal to the police powers of the Otate of New Jersey, intended to protect the public health, safety and welfare.
- 7. Provide the vision A. 20:25-10 and N.J.A.C. 7:27A-0 12, the begand out appoint to the complete control of penalty asserted, according to the penalty asserted; according to the economic benefit (in dollars) which a violator has repliced as a result of each a physical or by delaying coupliance with this Act.
- So Promount to N.J.S.A. Of Coldon's IN.J.S.A. 20:20-19(3) was presented with violated the provintion of the Act of the Act of the C.T. In the provintion of the Act of the Act of the C.T. In the Jerse C.T. addingstrative penalty to full, shall be Table to a penalty of automatical than 210,000 for the Second offense, and not of the Second offense.

ARSYNCO, INC. A920459 PAGE 3

- Pursuant to N.1.8.A. 26:20-10(f)) and person who purposely or knowledly violates the provisions of the bet, or any code, role, regulation, administrative order of court code, grantificated or issued present thereto, is cufity of a crim of the third degree.
- 10. Pursuant to N.J.S.A 26:20-10(f)2 .ny person who recklessly libilities the provisions of the Act, or any each, rule, regulation, administrative order or court order probabled or issued pursuant thereto. In pullty of a crime of the fourth degree.

Dated: May 15, 1992

Donald F. Patterson, Assistant Director At A Davissemental Quality Enforcement

CERTIFIED MAIL

AIR PULLUTION CONTROL - ATTACHMENT I E

Adjudicatory Hearing Request Checklist and Tracking Form for Enforcement Document(s)

Title	of Enforcement Document(s)	
Issua	nce Date of Enforcement Document(s)	Document Log Number(s)
Perso	on Requesting Hearing:	
Nam	e	Name of Attorney, if applicable
Addr	ess	Address of Attorney
A. B. C.		enforcement document being contested; ngs of fact, or a statement of insufficient knowle
A. B.	The date the alleged violator received the e A list of all issues being appealed; An admission or denial of each of the finding. The defenses to each of the findings of fact Information supporting the request; An estimate of the time required for the he	enforcement document being contested; ngs of fact, or a statement of insufficient knowled in the enforcement document; earing;
A. B. C. D. E.	The date the alleged violator received the e A list of all issues being appealed; An admission or denial of each of the finding. The defenses to each of the findings of fact Information supporting the request; An estimate of the time required for the he A request, if necessary, for a barrier-free he A clear indication of any willingness to nego	enforcement document being contested; ngs of fact, or a statement of insufficient knowled in the enforcement document; earing; earing location for physically disabled persons; obtaite a settlement with the Department prior to
A. B. C. D. E. F.	The date the alleged violator received the e A list of all issues being appealed; An admission or denial of each of the finding. The defenses to each of the findings of fact Information supporting the request; An estimate of the time required for the he A request, if necessary, for a barrier-free he A clear indication of any willingness to negotiate the property of the property o	enforcement document being contested; Ings of fact, or a statement of insufficient knowled in the enforcement document; Itaring; Itaring; Itaring location for physically disabled persons; Itaring location
A. B. C. D. E. F. G. H.	The date the alleged violator received the eA list of all issues being appealed; An admission or denial of each of the finding. The defenses to each of the findings of fact Information supporting the request; An estimate of the time required for the heA request, if necessary, for a barrier-free heA clear indication of any willingness to negon Department's referral of your hearing requested. This form, completed, signed An LISTED ABOVE INCLUDING ATTACHMINE.	enforcement document being contested; Ings of fact, or a statement of insufficient knowled in the enforcement document; Itaring; Itaring; Itaring location for physically disabled persons; Itaring location
A. B. C. D. E. F. G. H.	The date the alleged violator received the each list of all issues being appealed; An admission or denial of each of the finding. The defenses to each of the findings of fact Information supporting the request; An estimate of the time required for the heach request, if necessary, for a barrier-free heach clear indication of any willingness to negon Department's referral of your hearing request THIS FORM, COMPLETED, SIGNED AND LISTED ABOVE INCLUDING ATTACHMENT.	enforcement document being contested; Ings of fact, or a statement of insufficient knowled in the enforcement document; It caring; It caring location for physically disabled persons; It is to the Office of Administrative Law; IND DATED WITH ALL OF THE INFORMATE ENTS, SHALL BE SUBMITTED TO: In partment of Environmental Protection and Environmental Protectio
A. B. C. D. E. F. G. H.	The date the alleged violator received the each list of all issues being appealed; An admission or denial of each of the finding. The defenses to each of the findings of fact Information supporting the request; An estimate of the time required for the heach a request, if necessary, for a barrier-free heach a clear indication of any willingness to nego Department's referral of your hearing request THIS FORM, COMPLETED, SIGNED AND LISTED ABOVE INCLUDING ATTACHMED. 1. Richard J. McManus, Director, Deposition of Legal Affairs, CN 402, Tree AND A COMPLETE COPY TO: 2. Donald F. Patterson, Assistant Director, Deposition of the pattern of the pattern of the finding appeal of the	enforcement document being contested; Ings of fact, or a statement of insufficient knowle in the enforcement document; Itaring; Itaring location for physically disabled persons; Itate a settlement with the Department prior to est to the Office of Administrative Law; IND DATED WITH ALL OF THE INFORMATENTS, SHALL BE SUBMITTED TO: Inpartment of Environmental Protection and Encentron, New Jersey 08625-0402. In partment of Environmental Protection and Encentron, New Jersey 08625-0402.

EF 7	NEW JERSEY DEPARTMENT OF			DOC #	
2/94	ENVIRONMENTAL PROTECTION AND ENERGY			DATE RECD	
	DIVISION O	F FACILITY WI	DE ENFORCEMENT	TMA	
•	Eì	NFORCEMENT IN	VOICE		
ATE	PROGRAM ID #	PROGRAM	DESCRIPTION	DATE DUE	AMOUNT DUE
5/15/92	A920459	AIR	8.3(e)1	6/15/92	\$12,000.00
	TYPE OF 1	REVISED BILL	ING		
RSYNCO,	8	T 07072			

SAVE THIS COPY FOR YOUR RECORDS --

114		
DEQ-116 NEW JEI 4/89	RSEY DEPARTMENT OF ENVIRONMENT DIVISION OF ENVIRONMENTAL QU	2. 2.29 March 2 4. 2.29
	BUREAU OF EMERGENCY RESPO	a with the second of the secon
F	ELD NOTICE OF VIOLA	TIONS
CASE NO. 97-10-14-09	39 78	DATE 10/11/92
		UAIE
CASE NAME A/SYNCO T		
INCIDENT LOCATION ALSYN	co Inc. (North Ea	st (control Priparty)
RESPONSIBLE PARTY ADDRESS	Foot OF 13th	st.
	Carlstadt, Ber	gen Co
RESPONSIBLE PARTY REPRESEN	TATIVE Dennis SP	hce h
The second secon	Jack Dillon	
You are hereby NOTIFIED that during a	n investigation by DEP on the above	date, the following violations of New Jer
Statute and/or Regulation were observe	d. This violation has been recorded	as part of a permanent enforcement his
file. In addition, this case is being forward	urded to the appropriate Division with	a recommendation that formal enforcem
action be taken.		
NJSA 58:10-23.11 _	SPILL (COMPENSATION AND CONTROL ACT
NJSA 23:5-28	POLLU	ITION AND OBSTRUCTION OF WATER
NJAC 7:26— _	HAZAS	RDOUS WASTE REGULATIONS
TOPO 17.20		
The second secon		
		Occurped at facili
attorabout 0700	hours. Notification	~ Medo to Depos
Althore at 09:	39 hours (beyond	15 min).
W. 21		
Within days of receipt of t	nis notice, you snail submit in writing	, to the address and investigator indicat
below, an account of the incident and o	arractive messures taken to attain a	omoliance

Actions to be taken investigator Bruce Doyle

Note to be taken investigator Bruce Doyle

Removal of fee Product

Address 2 Babcock Place

W. Orange IN S. 0705-2

Flagmachility - Remediate as necessary

COPIES: White-File Yellow-Investigator Pink-Responsible Party

COPIES: White - File Tellow - Investigator Pink - Responsible Party

00311 ARSYNCO, INC. DHEDRING T12080 VENDOR: OUR REF. NO. YOUR INV. NO. INVOICE AMOUNT AMOUNT PAID **NET CHECK AMO** INVOICE DATE DISCOUNT TAKEN .00 12,000. 12,000.00 052992 05/29/92 12,000.00 4311 CHECK TOTAL 12,000.

CHECK NO. | CHECK DATE | VENDOR NO. 3116 05/29/92 T12080

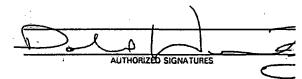
ARSYNCO, INC. P.O. BOX 8 CARLSTADT, N.J. 07072 1-12 280

CHEMICALBANK
410 Northern Blvd.
Great Neck, N.Y. 11201

TWELVE THOUSAND AND 00/100 DOLLARS

CHECK AMOUNT \$****12,000.00

TREASURER, STATE OF NEW JERSEY
TO THE BUR OF REVENUE-DIV OF FIN MGT
ORDER OF CN 402
TRENTON, NJ 08625-0402



#003116# #028000121# 201#015374#



P. O. Box 8 • Carlstadt, N. J. 07072 201-933-2323

November 12, 1992

Bureau of Discharge Prevention New Jersey Department of Environmental Protection and Energy 401 East State Street CN 027

Trenton, N. J. 08625-0027

Attention: Discharge Confirmation Report

Re: Case No. 92-10-14-0939-48

Plant ID: 00098

Dear Sirs,

On Wednesday, October 14, 1992 at approximately 0700 hours there was an accidental discharge of about 50 gallons of xylene onto the ground and into a tidal ditch located adjacent to Building No. 19 at the Arsynco, Inc. facility. There were no injuries. The incident was reported to NJ DEPE by phone at about 0940 hours and was given the reference Case Number. This letter is the Confirmation Report required by NJAC 7:1E-5.8.

Per NJAC 7:1E-5.8(b):

1. The name, address and telephone number of the individual that reported the discharge is as follows:

Jack B. Feder 66 Teak Rd. Dumont, N. J. 07628 (201)-384-1218

2. The name, address and telephone number of the individual submitting the Confirmation Report is as follows:

Dennis V. Space 28 Cambridge Drive Annandale, N. J. 08801 (908)-730-9562

3. ...the name, address and telephone number of the person subject to the provisions of 7:1E-5 for whom the Confirmation Report is being submitted:

Not applicable

Page 2
Bureau of Discharge Prevention, NJ DEPE

4. The name, address and telephone number of each person in any way responsible for the discharge is as follows:

Feroz Khan (Operator) 132-59 Metropolitan Ave. Queens, N.Y. 11418 (718)-739-1353

Timothy McDermott (Shift Foreman) 637 Woodland Ave. Lawrance Harbor, N.J. 08879 (908)-290-9143

Richard Nathanson (Production Manager) 89-14 Bedell Lane Brooklyn, N.Y. 11236 (718)-763-5823

5. The name, address and telephone number of each owner and operator of the facility at which discharge occurred is as folows:

Arsynco, Inc. is a wholly owned subsidiary of Aceto Corp.

1 Hollow Lane
Lake Success, N.Y. 11042-1215
(516)-627-6000

- 6. The source of the discharge was the outdoor vent line of an indoor 1,000 gallon glass lined storage vessel, TS-267.

 (The vessel was overfilled.)
- 7. The location of the discharge was:

 i. From Building No. 19 at Arsynco, Inc., Foot of 13th
 Street, Carlstadt, N. J. 07072, Tax Lot 1, Block 91. The
 facility is located in Bergen County. The NJ DEPE Plant ID.
 is 00098. A map of the plant site showing the area in which
 the discharge occurred and the surrounding area is enclosed.
 - ii. The discharge drained from the land beneath the vent pipe into a "mosquito" ditch located a few feet away. This ditch drains into Never Touch Creek, about 1/4 mile away from the discharge site. Never Touch Creek in turn joins Berry Creek. The discharge location is at $40_050'7$ " North Latitude and $74^05'$ West Longitude. A map identifying the areas affected by the discharge is enclosed.
- 8. The common name of the hazardous substance discharged is XYLENE (MIXED) and its CAS number is 1330-20-7.
- 9. A "best estimate" of the quantity discharged is 50 gallons.

Page 3
Bureau of Discharge Prevention, NJ DEPE

- 10. The date and time the discharge began: 10/14/92 @ 0700 hours. The date and time the discharge was discovered: 10/14/92 @ 0701 hours.
 - The date and time the discharge was ended: 10/14/92 @ 0702 hours.
 - The date and time the DEPE was notified: 10/14/92 @ 0940 hours.
- 11. Measures taken to contain, clean up and remove the discharge:
 - A. Floating separators made of absorbent within long canvas bags ("pigs") are normally kept in place across four parts of the mosquito ditch, forming barriers which force the water to flow beneath them, thus containing any floating solvents (such as xylene) which might inadvertently come into the water. After the discharge, additional pigs were deployed to contain most of the xylene reaching the ditch, keeping it from flowing into the creek.
 - B. Granular adsorbent (Sorb-All) was shoveled onto the land area beneath the vent discharge point and also along the downgrade to the mosquito ditch. This material will be packaged and disposed of in conjunction with our Voluntary Compliance Program. The Memorandum of Agreement for this is administered by Mr. Arnold Schiff, DEPE Bureau of Field Operations, West Orange, N.J.
 - C. A submersible centrifugal pump was then placed into each of the "compartments" formed by the berms. This pump was used to remove floating xylene from the compartments, along with some water and xylene contaminated muck, and send it to our waste water treatment facility. There, surface "vacuums" and oil mops remove floating solvents from the water and bring it to a storage container from which it is disposed of as a hazardous waste. This method of handling is a part of the Contingency Plan for the Arsynco plant.
 - D. An on-site test for flammability, viewed by a representative of NJ Dept. of Health's HAZMAT team, was done of the soil beneath the TS-267 vent pipe discharge. No evidence of flammibility was found.
 - E.. Costs for Items A and C are nominal. Costs for disposing of the spent granular absorbent are not yet known.
- 12. Corrective actions or countermeasures taken or proposed to minimize the possibility of recurrence include:
- A. The discharge end of vessel TS-267's vent line has been relocated so that, should overflow ever inadvertently occur in future, the xylene would flow onto a concrete pad

separated from the bare ground by a concrete curbing.

- B. The sight glass on vessel TS-267 has been replaced with a type more easily read. (Operator difficulty in seeing where the level was is believed to have contributed to the overfilling of the vessel.)
- C. The piping around vessel TS-267's sight glass was modified to allow removal of any solid particulates that might block the sight glass and prevent it from showing a true reading.
- 13. Additional operator training will be undertaken so as to minimize the possibility of recurrence.
- 14. Arsynco, Inc. has, thus far, been the only entity directly involved in the containment, cleanup or removal of the discharge. Inspection of the containment and cleanup was made by Mr.Bruce F. Doyle, NJ DEPE Bureau of Emergency Response, West Orange, H.J., as well as by representatives of NJ Dept. of Health (HAZMAT) and the Bergen County Police.
- 15. At this time, no samples have been taken. Such samplings might occur in future as a part of our Voluntary Compliance Program. The Memorandum of Agreement for this is administered by Mr. Arnold Schiff, DEPE Bureau of Field Operations, West Orange, N.J.
- 16. No results of samplings are available, since no samples have as yet been taken (per Item 15).
- 17. Arsynco, Inc. hereby states that it can meet its financial responsibility for taking corrective action for this discharge.
- 18. No supplemental information is available.
- 19. If able, we will provide DEPE with requested information.
- 20. A fully executed certification persuant to NJAC 71:4.11 is attached.

cc: J. Dillon

B. Doyle, DEPE Bur Emerg Resp

J. Feder

P. Herzberg, Counsel

E. Ippolito H. Olenberg

A. Schiff, DEPE Bur Field Ops

Very truly yours,

Dennis V. Space

President and General Manager



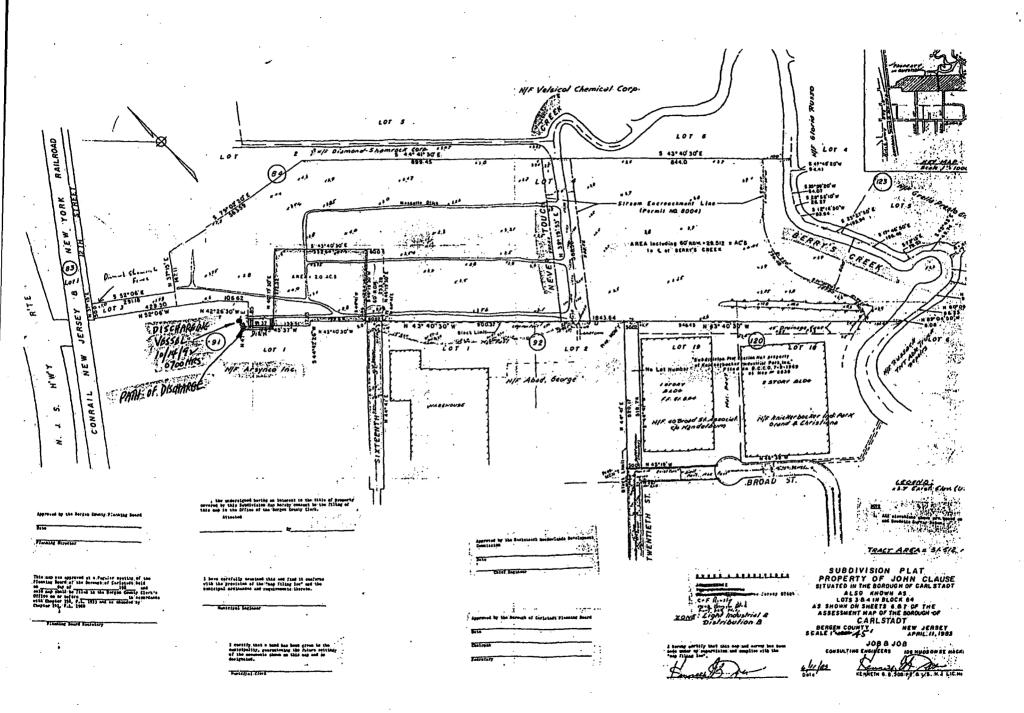
CERTIFICATION OF DENNIS V. SPACE

- I, Dennis V. Space, do hereby certify that:
- 1. I am President of Arsynco Incorporated ("Arsynco") at Arsynco's facility located at the Foot of 13th Street, Carlstadt, NJ 07072, (201) 933-2323 ("the Facility"). As such, I make this Certification in support of Arsynco's claim, pursuant to N.J.S.A. 7:1E-5.6 that it notified the NJ DEPE as immediately as reasonably possible regarding a discharge of approximately 50 gallons of Xylene at the Facility on October 14, 1992.
- 2. The discharge began at approximately 7:00 AM on October 14, 1992. and was immediately halted and remediation efforts immediately began by Timothy McDermott, a Production Supervisor for Arsynco at the Facility.
- 3. In the excitement and stress of the moment and due to the immediate and ongoing remediation efforts, Arsynco personnel did not notify NJ DEPE until approximately 9:40 AM, at which time Arsynco's Environmental Department called the NJ DEPE Hotline.
- 4. Because the Arsynco personnel who discovered the discharge were involved in immediate and ongoing remediation efforts, initiation of the notification procedures within 15 minutes would have been unreasonable.

I certify that the foregoing statements made by me are true.

I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DENNIS V SPACE





USE THIS AIRBULL FOR SHIPMENTS WITHIN THE CONTINENTAL U.S.A. ALASKA AND HAWAII. USE THE INTERNATIONAL AIR WAYBILL FOR SHIPMENTS TO PUERTO RICO AND ALL NON U.S. LOCATIONS. QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

5538412202

2259N 553	18475505			•	,
1001-7198-8	Date /	erde. The		SENDER'S COPY	
Find (Your Name) Please Print	Your Phone No	umber (Very Important)	To (Recipient's I	Name) Please Print Rect	plent's Phone Number (Very Important)
DENNIS ST	PACE COI-R	733-2323	ATTIV	DISCHARGE COM	is march &
Cultifiany	D	epartment/Floor No.	Company (3	UT OF DISCHOLLER	Department/Floor No.
ARSYNCO	annoning quantities (a. of no. g., where a president support and a support a support and a support and a support and a support and a support a support a support and a support a s	- Literatura	Fract Street Add	dress (We Cannot Deliver to P.O. Boxes of P.O. Zio Codes.)	
FOOT 13TH ST	•		4016		t 67027
City	State ZIP Requir	red	City	State	7/P Required
CARLSTADT	NJ 07	072	70530	ton N.J	08625-0027
YOUR INTERNAL BILLING REFERENCE INFORMA	TION (optional) (First 24 characters will appear on I	Invoice.)	Ŀ	IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address	
	FedEx Acct. No. 3 Bill 3rd Pany FedEx Acct. No.	4 Bill Credit C	ard		//PRequired
Gasty / Acct./Credit Card No		Exp.			1
SERVICES (Check only one box)	DELIVERY AND SPECIAL HANDLING (Check services required)	MCKAGES WEIGHT In Pounds Only	YOUR DECLARED VALUE	SERVICE CONDITIONS, DECLARED VALUE AND LIMIT OF LIABILITY	
ITANTY Overright Standard Overright (Debut & not business affinon to business affinon the Survey debuty)		1-1		Use of this airbill constitutes your agreement to the service cond in our current Service Guide, available upon request. See be sender's copy of this airbill for information. Service conditions	ck of
11 PACKAGING 51 PACKAGING	2 DELIVER WEEKDAY			vary for Government Overnight Service. See U.S. Govern Service Guide for details.	ment Declared Value Charge
10 FEDEX LETTER . 56 FEDEX LETTER.	3 DELIVER SATURDAY (Extra charge) [We will not be responsible for any claim in excess of \$100 package, whether the result of loss, damage, delay, non-del misraferance or nightforwaries united was teacher as history and the control of th	0 per
17 FEDEX PAK . 52 FEDEX PAK .	4 DANGEROUS GOODS (Extre charge)	Total Total	Total	package, whether the result of loss, damage, delay, non-del misdelvery, or misinformation, unless you declare a higher v pay an additional charge, and document your actual loss for a claim, Limitations found in the current Federal Express Service (aude Other 2
13 FEDEX BOX 53 FEDEX BOX 14 FEDEX TUBE 54 FEDEX TUBE	5	Tiolai	iotai	apply. Your right to recover from Federal Express for any including intrinsic value of the package, to see I sales, income into profit, attorney's fees, costs, and other forms of damage wh	ether
LUCCOY Two-Day Government Overnight	1 —	DIM SHIPMENT (Chai	peable Weight)	direct, incidental, consequential, or special is limited to the gres \$100 or the declared value specified to the left. Recovery or exceed actual documented loss. The maximum Declared Value	nieror / rotal Charges
Opening, by sectors drawness to, 1) (Restricted to supported users stop) 3(1) ECONOMY 46 GOVT	8 🗖		ibs.	FedEx Letter and FedEx Pak packages is \$500.00. In the event of untimely delivery, Federal Express will at request and with some timitations retund all transportation che	YOUT PART #137204 NCREC 6/92
41 GOYT	9 SATURDAY PICK-UP	L. W	/ , н	paid: See Service Guide for further information.	771
Freight Service (for packages over 150 tos.) OVERNIGHT 80 TWO-DAY	10	Received	JAI .	Sender authorizes Federal Express to deliver this shipment will obtaining a delivery signature and shall indemnify and harmless Federal Express from any claims resulting there	hold
FREIGHT **	12 HOLIDAY DELIVERY (# offered)	Regular Stop	3 ☐ Drop Box 4 ☐ B.S.C.	Release	PRINTED IN
1 fine year commitment may "Declared Value Limit \$500. "Call for delivery schedule."	(Extra charge)	2 ☐ On-Call Stop	5 D Station	Signature:	



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

March 10, 1993

Bureau of Discharge Prevention New Jersey Department of Environmental Protection and Energy 401 East State Street CN 027

Trenton, N. J. 08625-0027

Attention: Mr. James T. Horsley

Re: Discharge Confirmation Report for Case No. 92-10-14-0939-48

Dear Mr. Horsley,

In my letter to you of January 27th, I stated that I would write to inform you:

 that we had obtained the letter of credit required to demonstrate fiscal responsibility;

2. that we had properly disposed of the drum of waste materials (loose granular absorbent and canvas bags containing absorbent ["pigs"] used to absorb the spilled xylene), and the cost of said disposal.

Attached is a copy of a letter from United Jersey Bank confirming the establishment of an additional \$10,000 letter of credit (by increasing an existing \$20,000 to \$30,000) for the purpose of Item 1, above. The Bank will also have written to NJ DEPE directly to inform of this.

Attached is a copy of the manifest for the removal of the drum indicated in Item 2, above. The cost for its removal to a proper waste disposal site was \$ 700. This cost, taken together with the other disposal costs given in my letter of January 27th, should complete this section of the subject Confirmation Report.

Very truly yours,

Dennis V. Space

President and General Manager

cc: J. Dillon

J. Feder

P. Herzberg, Counsel,

E. Ippolito

H. Olenberg



February 24, 1993

Mr. John Larocca
Controller
Aceto Corporation
One Hollow Lane
Lake Success, New York 11042

Dear John:

This is to confirm that United Jersey Bank has increased the existing \$20,000 standby letter of credit to a \$30,000 standby letter of credit, expiring December 12, 1993. Please note that a trigger date of August 12, 1993 has been placed on this instrument.

Enclosed are copies of the documents signed by James Dillon, in connection with the assignment of a \$35,000 certificate of deposit in the name of Arsynco, Inc. This certificate of deposit has been booked for a period of seven months, with interest payable at maturity - September 22, 1993. If the standby letter of credit continues to remain open beyond that date, we will seek an additional rollover.

If you require additional information, please do not hesitate to contact me directly at (201) 646-5424.

Sincerely,

MAUREEN MILLER

Assistant Vice President

MM/jh Enc.

cc: James Dillon

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

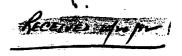
Bureau of Waste Management

AND CHEMOTHERAPPUTIC WASTE.

YEA

•				lox 8550	•			r	inta abboosed
	A STATE	OFFIC	Harrisburg, P IAL PENNSYLV	PA 17105-8550	T EOOM				MB No. 2050-0039 xpires 9-38 92
-	1 W/4 51 REV. 1/91		rator's US EPA ID		Manuest	2. Page 1	Information		
4.4	UNIFORM HAZARDOL WASTE MANIFEST	75 J. General 1. Gener		35 2	3620	of 7	is not requ	red by Fe	deral law
Ť	Generator's Name and Malling	<u>ــــانىتىن ئىيىــــا</u> ـــــا			3000	A. State M	bul is requ	red by Stanta	ole law.
1	APSYNCO Inc	wadiess				P	AC 78	236	20
1	Foot of 13th Stre	et Carlstadt,	NJ 97072			B. State Ge			
	1 Generator's Phone (201	933 2323	,				SAJ	Æ	
	1 Transporter 1 Company Na		6.	US EPA ID Num	ber	C. State Ti	ans. ID NJ	DEPSO	5209
i	Republic Env. Sys.	(PA)	IPADO	85690	592	PA-	1 1 1	••	ł
	/ Iransporter 2 Company Na			US EPA ID Num		D. Transpo	rter's Phone	215 A	2 8995
			i			E. State Tr	ans, ID		
	9 Designated Facility Name and			. US EPA ID Nun	mber	PA-	1 11		1
	Popublic Environme		(PA) Inc			F. Transpo	rter's Phone)	
	2869 Sandstone Dr					G. State F	scility's ID		
	Matfield, PA 1944)	PADO8	56905	9 2	H. Facility	s Phone Q15	X822 8	3996
	11 US DOT Description (Includi	ng Proper Shipping Nam			12. Conta		13, Total	14. Unit	I. Waste No
	" PO Hazardous Wast	e Solid, n.o.	5 •	***	No.	Туре	Quantity	Wt/Vol	
		189					0 - 7		
	(Xylene Rooms Aba	sorbant Soil)		11239	pol	DWD	0080	ן פ	U 2 3 9
G	ts.								
iı							•		
E									
A	ic.								
O					ł			i	
п				:		. _	·		
l	j d.				1				
	{		•	•	1	1 1		1	
	i. Additional Descriptions for Ma	terials Listed Above	····			K. Handlin	g Codes for W	astos Liste	d Above
	Lah Pack Physical Stat		Lab Pack	Physical State			1		
		D30176 (T)	c		•	a. 5	501.	2 .	
									
	ъ [*	d			b.		1.	
	15 Special Handling Instruction	and Additional Informa	lion PO#		ERG	31			
11		. '	5500 F # (UコススU	Bassas	ar Dhan	601)93	3-23
11			DECYL #	1327	cherger	icy Phon	" ' L		
					Contact	:: NOT	nes v	1 LLG	<u> </u>
	İ						• •		
			<u> </u>				 		
	th, GENERATOR'S CERTI	FICATION: I hereby de- tabaled and are in all respec	clare that the conter is in proper condition	nts of this consigning for transport by high	ient are fully and a phway according to	ccurately descr applicable inter	ibed above by p notional and natio	roper shipp nal governi	ing name and a nent regulations
	if I am a large quantity general practicable and that I have sele- ant the environment; OR, if I a	tor. I certify that I have a procted the practicable method	ogram in place to re	educe the volume and	d toxicity of waste o	enerated to the	degree I have d	etermined to	o be economica: it to himan beat
	avoidable to me and that I can a	un a small quantity generate flord	or, I have made a god	od faith effort to min	limize my waste gen	eration and sel	ect the best wast	managem	ent method that
:	Printed/Typed Name			Signature (. ~ ^	~ .	7	MONTH	DAY VI
	CANOS	0570HGS		100		Stor V		<u>00</u>	100 17-
	r villect Typed Name	of Receipt of Materials		Signature /	-()- ()-/)	///	MONTH	DAY V
. i,	John TS	chatter		1 / 1/2	スタト	Scharl	6	グゴ	U.S.U.
1.	15 Transporter 2 Acknowledgement	Receipt of Malarials		1 10	<u> </u>			<u> </u>	1001.0
i n	Printed/Typed Name		•	Signature				MONTH	DAY YE
1	and the second s			<u> </u>					
r	19. Discrepancy Indication Spa	ice.							
A C						*			
1					•				
1.	20. Facility Owner or Operato	r: Certification of receipt	of hazardous mat		this manifest exc	ept as noted	in liem 19.		
	Frinled/Typed Name		_	Signature				MONTH	DAY YEA
	•			1				1	, :





State of New Jersey Department of Environmental Protection and Energy Enforcement

Scott A. Weiner Commissioner

Edward M. Neafsey Assistant Commissioner

October 21, 1992

ash for thorney of 11/14 (Salarda

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dennis Space Senior Vice President and General Manager Arsynco Incorporated P.O. Box 8 Foot of 13th Street Carlstadt, New Jersey 07072

Re: Administrative Order and
Notice of Civil Administrative Penalty Assessment
Arsynco Incorporated
NJPDES No. NJ0030970
Carlstadt/Bergen County

There is enclosed for service upon you an Administrative Order and Notice of Civil Administrative Penalty Assessment issued by the Department pursuant to the provisions of the Water Pollution Control Act, N.J.S.A. 58:10A-10b and d.

Notice is hereby given that Arsynco, Incorporated (hereinafter "Arsynco") is entitled to an administrative hearing. Any hearing request must include a complete Administrative Hearing Request Checklist and Tracking Form for Enforcement Documents (Tracking Form), financial assurance with documentation and all information specified below and must be delivered within twenty (20) calendar days after receipt by Arsynco of this Administrative—Order and Notice of Civil Administrative Penalty Assessment to:

- (1.) Richard J. McManus, Director Office of Legal Affairs CN402 Trenton, New Jersey 08626
- (2.) all co-permittees

with a copy of the Tracking Form and a copy of the complete hearing request to be filed at the same time with:

Please Respond To:

Peter T. Lynch, P.E., Chief NJDEPE-Division of Facility Wide Enforcement Metro Bureau of Water and Hazardous Waste Enforcement 2 Babcock Place West Orange, New Jersey 07052

Arsynco shall, pursuant to N.J.A.C. 7:14-8.4(a) in its request for a hearing, include the items and information listed on the attached Tracking Form. Also, if Arsynco intends to appeal the penalty assessed in this Administrative Order and Notice of Civil Administrative Penalty Assessment, Arsynco must submit to the Department financial assurance in the amount of \$20,000.00 for the penalty assessed in the form of a surety bond guaranteeing payment, an irrevocable letter of credit or a fully funded trust, worded identical to the wording specified in N.J.A.C. 7:14-8 Appendix D and a certification of acknowledgement worded identical to the wording specified in N.J.A.C. 7:14-8 Appendix D.

If no request for a hearing is received within twenty (20) calendar days of Arsynco's receipt of the Administrative Order and Notice of Civil Administrative Penalty Assessment, it shall become a final order upon the twenty-first (21) calendar day following its receipt by Arsynco and the penalty shall be due and payable. Please be advised that an untimely or incomplete hearing request will be denied and that the Department does not have the jurisdiction to extend the twenty (20) day deadline.

If you have any questions concerning this Administrative Order and Notice of Civil Administrative Penalty Assessment please contact Charles A. Berry, Environmental Specialist, Metro Bureau of Water and Hazardous Waste Enforcement, 2 Babcock Place, West Orange, New Jersey 07052 or by telephoning (201) 669-3900.

Very truly yours,

Peter T. Lynch, Chief

Metro Bureau of Water and Hazardous Waste Enforcement Field Operations

E30

Enclosure

c: Asst. Director, James K. Hamilton Wastewater Facilities Regulation Element Richard J. McManus, Director, Office of Legal Affairs Albert Greco, H.O. bc: Criminal Justice
Central File
Region File
M. DiStefano
Order Book
Zaheer Hussain
Kathy S. Mendoza, DAG, DOL



State of New Jersey Department of Environmental Protection and Energy Enforcement

Scott A. Weiner Commissioner Edward M. Neafsey Assistant Commissioner

IN THE MATTER OF

ADMINISTRATIVE ORDER AND

ARSYNCO INCORPORATED

NOTICE OF CIVIL ADMINISTRATIVE

CARLSTADT/BERGEN COUNTY

PENALTY ASSESSMENT

This Administrative Order and Notice of Civil Administrative Penalty Assessment is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection and Energy (hereinafter "NJDEPE" or "Department") by N.J.S.A. 13:1D-1 et seq. and the Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq., and duly delegated to the Assistant Director or Bureau Chief of Water and Hazardous Waste Enforcement pursuant to N.J.S.A. 13:1B-4.

FINDINGS

- 1. Arsynco Incorporated (hereinafter "Arsynco") is the operator of the facility located at the Foot of 13th Street, Carlstadt, Bergen County, New Jersey (Block 91, Lot 1).
- 2. NJDEPE issued a New Jersey Pollutant Discharge Elimination System ("NJPDES") Permit No. NJ0030970 (hereinafter "the Permit") to Arsynco on October 31, 1989. The effective date of the Permit was December 1, 1989. The expiration date is November 30, 1994.
- 3. Pursuant to the Permit, Arsynco discharges pollutants, as defined by N.J.A.C. 7:14A-1.9, into Berry's Creek.
- 4. No person shall discharge any pollutant except in conformity with a valid New Jersey Pollutant Discharge Elimination System (NJPDES) Permit issued pursuant to the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq.
- 5. Part III B/C 1.A of the Permit set forth specific parameters to be reported on Discharge Monitoring Report forms (hereinafter "DMRs") and

Please Respond To:

Tel. # .

ADMINISTRATIVE ORDER AND NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT PAGE 2 OF 5

identifies discharge limitations for each parameter for each permitted outfall.

6. Arsynco submitted DMR Number 91121456, covering the reporting period of December 1, 1991 to December 31, 1991, to the Department. This DMR revealed the fact that the reported value for the Parameter 003430 for Chemical Oxygen Demand (COD) was in excess of the 50.0 Mg/L allowed by the Permit. Listed below are the date and parameter violated.

MAX MONIT. LOAD AVG DMR PERIOD DSN CONC. MIN <u>UNITS</u> **NUMBER** VIOL NO. PARAMETER <u>LIMIT</u> DATA END DATE EFF 001 COD-day MAX 50.0 Mg/L 4,340 91121456 12/30/91 Conc

The following abbreviations were used in the table above:

MAX - Maximum,

COD - Chemical Oxygen Demand

day - Daily

Mg/L - Milligrams per Liter

7. Based on the facts set forth in these FINDINGS, the Department has determined that Arsynco has violated the Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq., specifically N.J.S.A. 7:14A-1 et seq., specifically N.J.A.C. 7:14A-1.2.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

- 8. Arsynco shall discharge pollutants only in conformity with a valid NJPDES Permit pursuant to the Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq., and the regulations promulgated pursuant thereto, N.J.A.C. 7:14A-1.1 et seq.
- 9. Obligations and penalties of this Administrative Order are imposed pursuant to the police powers of the State of New Jersey for the enforcement of law and the protection of public health, safety and welfare and are not intended to constitute debt or debts which may be limited or discharged in a bankruptcy proceeding.
- This Administrative Order shall be effective upon receipt.

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

11. Pursuant to N.J.S.A. 58:10A-10d and N.J.A.C. 7:14-8 et seq., and based upon the above FINDINGS, NJDEPE has determined that a civil administrative

ADMINISTRATIVE ORDER AND NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT PAGE 3 OF 5

penalty should be assessed against Arsynco in the amount of \$20,000.00. NJDEPE's rationale for this Civil Administrative Penalty is set forth in Appendix A which is attached hereto and incorporated herein.

12. Payment of the penalty is due when a final order is issued by the Commissioner subsequent to a hearing if any, or when this Notice of Civil Administrative Penalty Assessment becomes a final order (see following paragraph). Payment shall be made by certified or cashier's check payable to "Treasurer, State of New Jersey" and shall be submitted with the white copy of Form DEP - 062A (copy attached) to:

Bureau of Revenue

New Jersey Department of Environmental Protection and Energy
Carroll Building, 428 E. State Street, 1st. Floor
CN 417

Trenton, New Jersey 08625-0402

- 13. If no request for a hearing is received within twenty (20) calendar days after receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment by Arsynco, it shall become a final Order upon the twenty-first calendar day following its receipt by Arsynco and the penalty shall be due and payable.
- 14. Notice is given that pursuant to N.J.S.A. 58:10A-10d and N.J.A.C. 7:14-8.12, the Department may, in addition to any civil administrative penalty assessed, amend such penalty assessment to include a civil administrative penalty for the economic benefit (in dollars) which a violator has realized as a result of not complying, or by delaying compliance, with this Act.

NOTICE OF RIGHT TO A HEARING

- 15. Arsynco is entitled to an administrative hearing. Any hearing request must include the information specified in paragraph 16 below and shall be delivered to Richard J. McManus, Director, Office of Legal Affairs, CN-402, Trenton, New Jersey 08625 within twenty (20) calendar days after receipt by Arsynco of this Administrative Order and Notice of Civil Administrative Penalty Assessment. A copy of the completed, signed, and dated Administrative Hearing Request Checklist and Tracking Form and a copy of the complete hearing request shall be filed at the same time with Peter T. Lynch, P.E., Chief, Metro Bureau of Water and Hazardous Waste Enforcement, 2 Babcock Place, West Orange, New Jersey 07052.
- 16. Arsynco shall, pursuant to N.J.A.C. 7:14-8.4(a), in its request for a hearing, furnish the Department with all of the information specified in the enclosed Administrative Hearing Request Checklist and Tracking Form.
- 17. If Arsynco intends to appeal the penalty assessed in this Administrative Order and Notice of Civil Administrative Penalty Assessment Arsynco must, in accordance with N.J.A.C. 7:14-8.4(a), submit to the Department financial assurance in the amount of \$20,000.00, for the penalty assessed, in the form of a surety bond guaranteeing payment, an irrevocable letter of credit or a

ADMINISTRATIVE ORDER AND NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT PAGE 4 OF 5

fully funded trust, worded identical to the wording specified in N.J.A.C. 7:14-8 Appendix A and a certification of Acknowledgment worded identical to the working specified in N.J.A.C. 7:14-8 Appendix D.

GENERAL PROVISIONS

- 18. This Administrative Order and Notice of Civil Administrative Penalty Assessment is binding on Arsynco, its principals, directors, officers, agents, successors, assigns, any trustee in bankruptcy or other trustee, and any receiver appointed pursuant to a proceeding in law or equity.
- 19. Arsynco shall submit copies of all documents required by this Administrative Order and Notice of Civil Administrative Penalty Assessment by certified mail, return receipt requested or by hand delivery to:

Peter T. Lynch, Chief

NJDEPE - Division of Facility Wide Enforcement

Metro Bureau of Water and Hazardous Waste Enforcement

2 Babcock Place

West Orange, New Jersey 07052

Penalty payments shall be made in the same manner to the address in paragraph 12 above.

- 20. Notice is given that this Administrative Order and Notice of Civil Administrative Penalty Assessment is issued only for the violation identified in the Findings hereinabove and that violations of any statutes, rules or permits other than those herein cited may be cause for additional enforcement actions, either administrative or judicial, being instituted without further notice. By issuing this Administrative Order and Notice of Civil Administrative Penalty Assessment, the Department does not waive its right to initiate additional enforcement actions.
- 21. Notice is given that pursuant to N.J.S.A. 58:10A-10d, NJDEPE is authorized to assess a civil administrative penalty of not more than \$50,000 for each violation, and each day during which the violation continues shall constitute an additional, separate and distinct offense.
- 22. Notice is further given that pursuant to N.J.S.A. 58:10A-10e, any person who violates N.J.S.A. 58:10A-1 et seq., or an administrative order issued pursuant to N.J.S.A. 58:10A-10b, or who fails to pay the civil administrative penalty in full after it is due or who fails to make payment pursuant to a payment schedule entered into with the Department shall be subject to a civil penalty not to exceed \$50,000 per day of such violation, and each day's continuance of the violation shall constitute an additional, separate and distinct violation.
- 23. Notice is further given that pursuant to N.J.S.A. 58:10A-10f, any person who purposely, knowingly, or recklessly violates N.J.S.A. 58:10A-1 et seq., including making a false statement, representation, or certification in any application, record, or other document filed or required to be maintained

ADMINISTRATIVE ORDER AND NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT PAGE 5 OF 5

under this act, or by falsifying, tampering with, or rendering inaccurate any monitoring device or method required to be maintained pursuant to this act, or by failing to submit a monitoring report, or any portion thereof, required pursuant to this act, shall, upon conviction, be guilty of a crime of the third degree, and shall, notwithstanding the provisions of subsection b. of N.J.S.A. 2C:43-3, be subject to a fine of not less than \$5,000 nor more than \$75,000 per day of violation, or by imprisonment, or by both. Any person who negligently violates N.J.S.A. 58:10A-1 et seq., including making a false statement, representation, or certification in any application, record, or other document filed or required to be maintained under this act, or by falsifying, tampering with, or rendering inaccurate any monitoring device or method required to be maintained pursuant to this act, or by failing to submit a discharge monitoring report, or any portion thereof, shall, upon conviction, be guilty of a crime of the fourth degree, and shall, notwithstanding the provisions of subsection b. of N.J.S.A. 2C:43-3, be subject to a fine of not less than \$5,000 nor more than \$50,000 per day of violation or by imprisonment, or by both.

DATE: 10/21/92

PETER T. LYNCH, P.E., CHIEF METRO BUREAU OF WATER AND HAZARDOUS WASTE ENFORCEMENT

Appendix A

CIVIL ADMINISTRATIVE PENALTY RATIONALE

Arsynco Incorporated Carlstadt/Bergen County

Re: Violations of NJPDES Permit No. NJ0030970

N.J.A.C. 7:14-8.5 Discharge of Effluent in Excess of Permit Limitations

SERIOUSNESS: Pursuant To N.J.A.C. 7:14-8.5(g)1, the seriousness factor is considered to be major when a discharge violation has exceeded the Permit effluent limitation by more then 50 percent for a hazardous pollutant or the Permit effluent limitation by more then 100 percent for a non-hazardous pollutant. Since Total Chemical Oxygen Demand (COD) is considered a non-hazardous pollutant and the Permit effluent limitations have been exceeded by more than 100 percent, the seriousness factor is considered to be major.

<u>CONDUCT</u>: The Department does not currently have information in its possession which would support the firm conclusion that this violation constituted intentional, deliberate, purposeful, knowing, willful, or foreseeable conduct on the part of the violator. Therefore the conduct is **minor**.

MONITORING PERIOD: December 1, 1991 to December 31, 1991

DMR NUMBER	MONIT. PERIOD END DATE	VIOL	DSN NO.	<u>PARAMETER</u>	LOAD CONC	MAX AVG <u>MIN</u>	<u>LIMITS</u>	<u>UNITS</u>	<u>DATA</u>
91121456	12/31/91	EFF	001	COD Day	C ·	Max	50.0	MG/L	4,340

Pursuant to N.J.A.C. 7:14-8.5(f), the Civil Administrative penalty assessed for this violation is \$20,000.

FORMULA: \$20,000 x 1 violation = \$20,000

PENALTY ASSESSED: \$ 20,000

DIVISION Division of	New Jersey Department of Environmental re if Revised Billing		
Case/Company Name	Arsynco, Inc. Foot of 13th Street	Local Regional	egory: Industrial Commercial Other - Specify
DATE ASSESSED	DESCRIPTION		AMOUNT
10/21/92	Administrative Order and Civil Admin Penalty Assessment.	istrative	\$20,000.00
DATE DUE: Wi	thin 21 days of receipt	AMOUNT DUE:	\$20,000.00

White - Remittance Copy Yellow - Company

Mail to: NJDEPE, Bureau of Revenue

Pink - Bureau of Revenue

CN 417, Trenton, N.J. 08625-0417

Goldenrod - Division

Make check payable to: Treasurer, State of New Jersey

COPY DISTRIBUTION:

Administrative Hearing Request Checklist and Tracking Form for Enforcement Documents

	le of Enforcement Document	
Iss	uance Date of Enforcement Document	Document Number (if any)
Per	son Requesting Hearing:	
Nam	e	Name of Attorney, if applicable
	· · · · · · · · · · · · · · · · · · ·	
<u> </u>	ress	Address of Attorney
naa	ress .	Address of Accorney
Ple	ase Include the Following Information	n as Part of Your Request:
A.		ved the enforcement document
В.	heing contested; A copy of the Enforcement Document	and a list of all issues being
c.	appealed; An admission or denial of each of the statement of insufficient knowledge	he findings of fact, or a
D.	The defenses to each of the finding document:	
E.	Information supporting the request;	
~ .		
F.	An estimate of the time required for	r the hearing;
F.	A request, if necessary, for a barr	r the hearing; ier-free hearing location for
	A request, if necessary, for a barr physically disabled persons; A clear indication of any willingne the Department prior to the Departm	ier-free hearing location for ss to negotiate a settlement with ent's processing of your hearing
F. G.	A request, if necessary, for a barr physically disabled persons; A clear indication of any willingne the Department prior to the Departm request to the Office of Administra	ier-free hearing location for ss to negotiate a settlement with ent's processing of your hearing tive Law; and ted with all of the information
F. G. H.	A request, if necessary, for a barr physically disabled persons; A clear indication of any willingne the Department prior to the Department request to the Office of Administra This form, completed, signed and da listed above, including attachments 1. Office of Legal Affairs	ier-free hearing location for ss to negotiate a settlement with ent's processing of your hearing tive Law; and ted with all of the information, to:
F. G. H.	A request, if necessary, for a barr physically disabled persons; A clear indication of any willingne the Department prior to the Department request to the Office of Administra This form, completed, signed and da listed above, including attachments 1. Office of Legal Affairs ATTENTION: Adjudicatory Heari Department of Environmental Pr	ier-free hearing location for ss to negotiate a settlement with ent's processing of your hearing tive Law; and ted with all of the information , to: ng Requests
F. G. H.	A request, if necessary, for a barr physically disabled persons; A clear indication of any willingne the Department prior to the Department request to the Office of Administra This form, completed, signed and da listed above, including attachments 1. Office of Legal Affairs ATTENTION: Adjudicatory Heari Department of Environmental Pr 401 East State Street	ier-free hearing location for ss to negotiate a settlement with ent's processing of your hearing tive Law; and ted with all of the information , to: ng Requests otection and Energy
F. G. H.	A request, if necessary, for a barr physically disabled persons; A clear indication of any willingne the Department prior to the Department request to the Office of Administra This form, completed, signed and dalisted above, including attachments 1. Office of Legal Affairs ATTENTION: Adjudicatory Heari Department of Environmental Pr 401 East State Street CN 402, Trenton, New Jersey 08 2. Peter T. Lynch, Chief, Metro B	ier-free hearing location for ss to negotiate a settlement with ent's processing of your hearing tive Law; and ted with all of the information , to: ng Requests otection and Energy 625-0402

NAME ARSYNCO INC			, ————————————————————————————————————	(2-16)	N: THE	7RT (17-19)		orm Approved	_		•	
ADDRESS PO BOX 8				030970				MB No. 2040	 -0004.	,		
EOOT_OE_13TH	LST		PERMI	TNUMBER	DISC	HARGE NUMBER		pproval expir				
CARLSTADT.NJ	_07072			MONI	TORING PERIO	20		_	•			•
PACILITY			- YEAR		AY YEAR	MO TOAY M	ATOK			ERGE	N	
LOCATION			_ FROM 91		71 70 91	12 31 M	ETRO RESI		•			•
DMR NUMBER: 91121456				(22-23) (24			1076 - Read mit	ructions befo	e com	pleting 1	this fo	ırm.
PARAMETER		(3 Card Only) QU (46-53)	ANTITY OR LOADIN (34-61)	G 	(4 Card Only) (38-45)	QUALITY OR CON- (46-5J)	(S4-61)	···	NO.	FREQUEN OF ANALYS	1CY 8	SAMPL! TYPE
(32-37)		XXXXXXX	XXXXXXXX	UNITE	XXXXXX	*******	**************************************	UNITS	(62-63)		•••	(69-70)
TEMPERATURE, WATER DEG. FAHRENHEIT	SAMPLE MEASUREMENT	****	*****		82.4	82.4	82.4	ox	0	//3.	0	SRAC
00011 1 0	PERMIT REQUIREMENT	******	******	****	REPORT	REPORT :: 30DA AVG		933356		X27.23.7		
DAYGEN DEMAND, CHEM-		0.	0.5		*****	1					7	<i>)</i>
(HIGH LEVEL) (COD)	SAMPLE MEABUREMENT	95.2	95,2	Kglan		4340	4340	Mg/4(1.	1/36	6	iens
00340 1 0. "	PERMIT	REPORT	REPORT	KG/	(Clause Electric		COSTONIO	ME/L		57		
FFELUENT GROSS VALUE	KAROINAFMENT	JODA AVG		DAY		SON WAS	1723 1 8 3 8 3 12					
PH	SAMPLE MEASUREMENT	00000	*****		7.85	*****	7.95	ક્ય	0	1/30	G.	RAB
00400 1 0	PERMIT. REQUIREMENT	900000	000000		6450000	000000	ALSOCIO BAXXIII	รบ				
SOLIDS, TOTAL					****					A A		e de la companya de l
SUSPENDED	SAMPLE MEASUREMENT	0.2	0,2	5/204		8	<i>P</i>	BIL	0	1/30	, O1	RAB
00530 1 0	PPRUIT	REPORT	<u> </u>	KG/		REFORT			1000	(T) Their		
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	BODA AVG	DATLY MX	DAY	-	30DA AVE	01:21:10:51			10. 5 · 2. 7		1304.3
HYDROCARBONS, IN H2D,	SAMPLE				****	10				1/2		1000
IR, CC14 EXT. CHROMAT	Maraging (Market)	0.2	0.2	Kg/say		10	10	Maple	0	1/30	4	RAB
00551 1 0	PERMIT REQUIREMENT	REPORT	REPORT	KG/	George	REPORT		MG/L				
EFFLUENT GROSS VALUE	REQUIREMENT	30DA AVG	DAILY MX	DAY	1927	30DA AVE	0015/201		1000	i. i. i. i. i. i. i. i. i. i. i. i. i. i		
CHROMIUM TOTAL (AS CR)	SAMPLE MEASUREMENT	NODI	NODI		*****	NODE	NODE] —	0	N	do	Z
01034 1 0	PERMIT	REPORT -	REPORT	KG/		REPURT		UG/L				
EFFLUENT GROSS VALUE	REQUIREMENT	BVA AUG	DAILY HX	DAY		30DA AVE	0.4447					
COPPER, TOTAL (AS CU)	BAMPLE MEASUREMENT	NODI	Nadi		****	NOSI	Nade		O	N	00	I
01042 1 0	PERMIT	REPORT	REPORT	KG/	(CEDE 01)	REPURI	30000000	0 UG/L		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
SEELUENT GROSS VALUE	REQUIREMENT	30DA AVG	DATLY HX	DAY		30DA AVG						
NAME/TITLE PRINCIPAL EXECUTIVE	ANO A	M FAMILIAR WITH THE	OF LAW THAT I HAVE I	D HEREIN, AL	ND BASED /			TELEPHON		D	ATI	<u> </u>
Emil A. Ippolito	OBTAIN IS TRU	ING THE INFORMATION ACCURATE AND CO	INDIVIDUALS IMMEDIATI IN, I BELIEVE THE SU OMPLETE I AM AWARE	BMITTED INF	ORMATION COLL	Kler Spoo	ato		ľ	·		'
N-ZOPER REGHN-00	10 NIFICAN	IT PENALTIES FOR ! DESIBILITY OF FINE AN	SUBMITTING FALSE INF ID IMPRISONMENT SEE der these statutes may in	ORMATION. 1	NCLUDING	URE OF PRINCIPAL		01 193-25	723	92	01	25
TYPED OR PRINTED	and we	mazimum impriniminietit ii	f between 6 munths and 5 v	PQ/A.1	OFFI	CER OR AUTHORIZ	20 20 20 20	DE NUME		YEAR	MO	DAY
HUNTYONING TO TOWN	ALCENTA NE	T'KEQUIRE1	"UNLESS IT	S VALL	JE IS INCRI	EASED AS A	RESULT D	F WATER	TRE	ATHE	NT-	1
MONITORING SHALL BE	DONE MONT	HLY WHENE	VER DISCHAR	GE OCC	CURS.							
FOR THE PARAMETER PE	TROLEUM H	YDROCARBON	NS THE LIMI	TATION	OF NO VI	SIBLE SHEE	N ALSO AP	PLIES-				

EPA Form 3320-1 (Rev. 9-88) Previous editions may be used.

LABS:



P.O Box 8 • Caristadt, N.J. 07072 201 • 933 • 2323

January 22, 1992

NJDEPE-DWR
Management Services Element-BIS
CN-029
Trenton, NJ 08625

Reference: NJPDES' Permit #NJ0030970

Discharge #001A DMR #91121456

Monitoring Period-12/1/91 to 12/31/91

Parameter- COD (00340-1-0)

Dear Sir:

The referenced DMR includes an excessively high reading for COD (4,340 mg/l vs. a daily max. of 50.0 mg/l). We are at a loss to explain the reason(s) for this excursion in COD. Checking back through the previous four years, we found that the highest COD reading obtained during that period was 41 mg/l. The result for December is high by a factor of 100!

Our outside testing laboratory was asked to recheck their calculations on the subject sample and they confirmed the calculations were correct. They were then asked to reanalyze the sample (it was still within the test time limits) and they reported back with essentially the same number. Preliminary results on our January 7, 1992 sample indicate that the COD is well below maximum limits.

Over the last several months, beginning in October, we have experienced several high tide conditions in our area. When these high tides occur, water from Berry's Creek backflows into our cooling pond (sample #001A). It is possible that this backflow water may have contributed in some way to the high COD result. We have, of course, no way of confirming this possibility.

Due to the fact that all previous results and one subsequent result are well within the required limits, we must assume: 1) the sample was somehow contaminated after it left our facility or 2) some anomaly, such as the high tide conditions, contributed to or caused this parameter to exceed the limitation.

If you have any questions, please call me at (201) 933-.
2323 between 8:30AM and 4:30PM.

Emil A. Ippolito

N-2 Oper Reg #N-0040

CC: Charles A. Berry
Metro Bureau of Regional Enforcement- DWR



State of New Tersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF FACILITY WIDE ENFORCEMENT
METRO BUREAU OF REGIONAL ENFORCEMENT
2 BABCOCK PLACE

WEST ORANGE, NEW JERSEY 07052

(201) 669-3900

October 26, 1992

Mr. Dennis Space Senior Vice President and General Manager Arsynco, Incorporated P.O. Box 8 Foot of 13th Street Carlstadt, New Jersey 07072

Re: Compliance Evaluation Inspection Arsynco, Incorporated NJPDES No. NJ 0030970 Carlstdt/Bergen County

Dear Mr. Space:

A Compliance Evaluation Inspection of your facility was conducted by a representative of this Bureau on October 16, 1992. A copy of the completed inspection report form is enclosed for your information.

Your facility received a rating of "UNACCEPTABLE" due to the following deficiencies:

1; The review of your facility's DMRs revealed the following deficiency for the December 1 to December 31, 1991 reporting period.

MONIT. MAX DMR **PERIOD** DSN LOAD AVG NUMBER END DATE <u>Viol</u> NO. PARAMETER CONC MIN LIMIT UNITS DATA CONC 001 COD (DAY) 91121456 12/31/91 EFF MAX 50.0 Mg/L

- 2) The concrete side walls of the Holding Pond are in need of repair.
- 3) The Foundation of Building No. 1 requires repair to stop seepage of an oily substance from the building.

New Jersey is an Equal Opportunity Employer Recycled Paper



The deficiencies noted above have placed your facility in significant violation of the terms and conditions of your NJPDES permit and/or the Water Pollution Control Act Regulations (N.J.A.C. 7:14A-1 et seq.). You are therefore DIRECTED to institute corrective measures. A written report concerning specific details of remedial measures to be instituted, as well as an implementation timetable, must be submitted to this Department and USEPA, Permits Administration Branch within fourteen (14) calendar days of the date of this correspondence.

You are advised that the New Jersey Water Pollution Control Act (N.J.S.A. 58:10A-1 et seq.) provides for substantial monetary and criminal penalties in cases of permit violations.

Please direct all correspondence and inquiries to Charles A. Berry, the Environmental Specialist responsible for this case, who can be reached at (201) 669-3900 or by letter through this Bureau.

Failure to fully comply with the above will result in the initiation of enforcement action by this Department. This shall in no way be construed, however, to indicate any exemption on your part from possible penalties for violations indicated by the Compliance Evaluation Inspection as stated above.

Very truly yours,

Stefen D. Sedlak

Section Chief

Metro Bureau of Water and Hazardous Waste Enforcement

E30:G27

c: Chief - Permits Administration Branch, USEPA Patrick M. Durack, USEPA Mr. Albert Greco, H.O.

Enclosure



June 10/20/92

State of New Jersey Department of Environmental Protection and Energy Enforcement

Scott A. Weiner Commissioner

Edward M. Neafsey Assistant Commissioner

OCT 2 1 1992

IN THE MATTER OF ARSYNCO INCORPORATED

FOOT OF 13TH STREET CARLSTADT, NJ 07072

ADMINISTRATIVE ORDER

AND

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

This Administrative Order and Notice of Civil Administrative Penalty Assessment is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection and Energy (hereinafter "NJDEPE" or the "Department") by N.J.S.A. 13:1D-1 et seg., and the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seg., and duly delegated pursuant to N.J.S.A. 13:1B-4.

:

FINDINGS

- The Department has determined that Arsynco, Incorporated (hereinafter "Arsynco") is a generator of hazardous waste (EPA ID# NJD 044 688 935), as defined in N.J.A.C. 7:26-1.4, located at the foot of 13th Street (Lot 1, Block 91) in the Borough of Carlstadt, County of Bergen, State of New Jersey.
- 2. On March 26 and April 4, 1991, Department personnel conducted on-site inspections of Arsynco's Carlstadt facility during which the following violations were observed: Arsynco failed to determine whether solid waste, as defined in N.J.A.C. 7:26-1.6, is hazardous waste, in violation of N.J.A.C. 7:26-8.5(a). Specifically, Arsynco failed to identify and classify the contents of several hundred drums of materials stored at its Carlstadt facility in a manner which would, pursuant to N.J.A.C. 7:26-1.6(c), cause said materials to be classified as solid waste by being in containers which were open, unsealed, or such poor condition as to allow leaking and spillage onto the ground and/or surrounding macadam, in violation of N.J.A.C. 7:26-8.5(a).
- 3. On June 26, 1991; July 8, 1991; January 17, 1992; and February 4, 1992, Department personnel reinspected Arsynco's Carlstadt facility and determined that Arsynco had not complied with N.J.A.C. 7:26-8.5(a) with respect to the materials identified in paragraph no. 2 above.

Please Respond To:

- 4. During the inspections conducted on January 17 and February 4, 1992, Department personnel observed the following additional violations:
 - a. Arsynco handled hazardous waste in such a manner as to cause an unauthorized discharge of pollutants onto or into the land, surface water, groundwater or air, in violation of N.J.A.C. 7:26-9.2(a)2. Specifically, three (3) drums of Benzene Sulfonyl Chloride, a class U020 hazardous waste; one (1) drum of o-Nitrochlorobenzene, a class U037 hazardous waste; and one (1) drum of "Muriatic Acid-Solids", a class D002 hazardous waste, were open and/or leaking onto the ground, in violation of N.J.A.C. 7:26-9.2(a)2.
- b. Arsynco failed to clearly mark and make visible for inspection on drums containing certain hazardous wastes, the date on which the accumulation period for the wastes in said drums began, in violation of N.J.A.C. 7:26-9.3(a)3. Specifically, Arsynco failed to mark four (4) drums containing "Acetone solution for disposal" with the date on which the accumulation period for each began, in violation of N.J.A.C. 7:26-9.3(a)3.
 - c. Arsynco failed to store certain hazardous wastes in containers of sturdy leak proof construction of adequate wall thickness; adequate weld, hinge and seam strength; and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the ability of the containers to fully contain the hazardous waste to be stored therein, in violation of N.J.A.C. 7:26-9.4(d)li. Specifically, the three (3) drums containing Benzene Sulfonyl Chloride and the one (1) drum containing o-Nitrochlorobenzene referred to in paragraph no. 4a above were open and/or leaking onto the ground.
 - d. Arsynco failed to transfer certain hazardous wastes from containers not in good condition and/or leaking to containers in good condition, or manage the wastes contained therein in some other way that complied with N.J.A.C. 7:26-9.4, in violation of N.J.A.C. 7:26-9.4(d)2. Specifically, Arsynco failed to transfer the contents of the drums referred to in the preceding paragraph to containers which satisfied the requirements of N.J.A.C. 7:26-9.4(d), in violation of N.J.A.C. 7:26-9.4(d)2.
 - e. Arsynco failed to comply with the requirements for the management of hazardous waste containers, in violation of N.J.A.C. 7:26-9.4(d)4i. Specifically, Arsynco failed to securely close each container of hazardous waste stored at its Carlstadt facility, other than when being filled or emptied, so as to prevent the escape of the hazardous waste contained therein or its vapors, in violation of N.J.A.C. 7:26-9.4(d)4i.
 - f. Arsynco failed to comply with the requirements for the management of hazardous waste containers, in violation of N.J.A.C. 7:26-9.4(d)4v. Specifically, Arsynco failed to arrange certain containers of hazardous waste stored at its Carlstadt facility in such a manner so that the identification label for said containers was visible, in violation of N.J.A.C. 7:26- 9.4(d)4v.
 - 5. On March 31, 1992, Department personnel reinspected Arsynco's Carlstadt facility and determined that Arsynco had not corrected the violations referenced in paragraphs 4b, 4e, and 4f above and, thus, had not complied

with N.J.A.C. 7:26-9.3(a)3, 7:26-9.4(d)4i and 7:26-9.4(d)4v.

- 6.) During the March 31,1992 inspection, Department personnel observed the following additional violations:
 - a. Arsynco failed to clearly mark and make visible on drums containing certain hazardous wastes, the date on which the accumulation period for the wastes in said drums began, in violation of N.J.A.C. 7:26-9.3(a)3. Specifically, Arsynco failed to mark one (1) drum containing xylene, a class U239 hazardous waste, with the date on which its accumulation period began, in violation of N.J.A.C. 7:26-9.3(a)3.
 - b. Arsynco failed to comply with the requirements for the management of hazardous waste containers in violation of N.J.A.C. 7:26-9.4(d)4v. Specifically, Arsynco failed to arrange certain containers of hazardous waste stored at its Carlstadt facility in such a manner so that the identification labels for said containers were clearly visible, in violation of N.J.A.C. 7:26-9.4(d)4v.
 - c. Arsynco failed to record inspections in an inspection log or summary and/or to retain such records for three (3) years from the date of inspection, in violation of N.J.A.C. 7:26-9.4(f)6. Specifically, the inspection sheet used by Arsynco was for an unused storage area undergoing closure while the storage areas in use, which were not exempt pursuant to N.J.A.C. 7:26-9.3, had no log or summary, in violation of N.J.A.C. 7:26-9.4(f)6.
 - d. Arsynco failed to maintain sufficient aisle space for the unobstructed movement of personnel and/or fire protection, spill control and decontamination equipment in an emergency, in violation of N.J.A.C. 7:26-9.6(e). Specifically, Arsynco maintained less than six (6) inches, and in some locations no space, between rows of drums containing hazardous wastes and other materials, in violation of N.J.A.C. 7:26-9.6(e).
 - 7. On April 14, 1992 a reinspection was conducted by Department personnel, and it was determined that Arsynco had not corrected the violations referenced in paragraphs 6(b) and 6(d) above.
 - 8. Based on the facts set forth in these FINDINGS, the Department has determined that Arsynco has violated the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and the regulations promulgated thereunder, specifically N.J.A.C. 7:26-8.5(a), -9.2(a)2, -9.3(a)3, -9.4(d)1i, -9.4(d)2, -9.4(d)4i, -9.4(d)4v, -9.4(f)6, and -9.6(e).

ORDER

NOW, THEREFORE, PURSUANT TO N.J.S.A. 13:1E-9c, IT IS HEREBY ORDERED THAT ARSYNCO SHALL:

9. Within fifteen (15) calendar days after receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment, correct the violations set forth in paragraphs 2, 4(b), A(e), 4(f), 6(b) and 6(d)





above.

10. Within twenty (20) calendar days upon receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment submit the enclosed VERIFICATION OF COMPLIANCE by certified mail, return receipt requested or by hand delivery to the address below, indicating that you have corrected the violations referenced in paragraphs 2, 4(b), 4(e), 4(f), 6(b), and 6(d) above.

New Jersey Department of Environmental Protection and Energy Metro Bureau of Water and Hazardous Waste Enforcement 2 Babcock Pl. W. Orange, NJ 07052-5504 Attention: Thomas Brady

THIS ORDER SHALL BE EFFECTIVE UPON RECEIPT.

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

- 11. Pursuant to N.J.S.A. 13:1E-9e and N.J.A.C. 7:26-5.4(f), and based upon the above FINDINGS, the Department has determined that a civil administrative penalty is assessed against Arsynco in the amount of \$146,500. The Department's basis for this Civil Administrative Penalty is set forth in the Penalty Assessment Worksheet(s) attached hereto and incorporated herein as Attachment A.
- 12. Payment of the penalty is due when a final order is issued by the Commissioner subsequent to a hearing, if any, or when this Administrative Order and Notice of Civil Administrative Penalty Assessment becomes a final order (see following paragraph). Payment shall be made by certified check payable to "Treasurer, State of New Jersey" and shall be submitted with the white copy of Form DEP-062A (copy attached) to:

New Jersey Department of Environmental Protection and Energy Bureau of Revenue CN 417 Trenton, NJ 08625-0417

13. If no request for a hearing is received within twenty (20) calendar days from receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment, it shall become a final order upon the twenty-first calendar day following its receipt and the penalty shall then be due and payable.

NOTICE OF RIGHT TO A HEARING

14. Pursuant to N.J.S.A. 52:14B-1 et seq. and N.J.S.A. 13: 1E-9, Arsynco is

entitled to an administrative hearing. Any hearing request, along with the enclosed ADMINISTRATIVE HEARING REQUEST CHECKLIST AND TRACKING FORM FOR ENFORCEMENT DOCUMENTS, shall be delivered to the addresses below within twenty (20) calendar days from receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment.

- (i) Office of Legal Affairs
 Attn: Adjudicatory Hearing Requests
 New Jersey Department of Environmental Protection and Energy
 CN 402
 Trenton, NJ 08625-0402
- (ii) New Jersey Dept. of Environmental Protection & Energy Metro Bureau of Water and Hazardous Waste Enforcement
 2 Babcock Place
 W. Orange, NJ 07052-5504
 Attention: Peter T. Lynch, Chief
- 15. Pursuant to N.J.A.C. 7:26-5.3 Arsynco shall, in its request for a hearing, furnish NJDEPE with the following:
 - a. the name, address, telephone number and EPA Identification Number (if applicable) of Arsynco and its authorized representative;
 - b. Arsynco's defenses, to each of the Department's findings of fact in the findings section of the administrative order or notice of civil administrative penalty assessment, stated in short and plain terms;
 - c. An admission or denial of each of the Department's findings of fact in the findings section of the administrative order or notice of civil administrative penalty assessment. If Arsynco is without knowledge or information sufficient to form a belief as to the truth of a finding, Arsynco shall so state and this shall have the effect of a denial. A denial shall fairly meet the substance of the findings denied. When Arsynco intends in good faith to deny only a part or a qualification of a finding, Arsynco shall specify so much of it as is true and material and deny only the remainder. Arsynco may not generally deny all of the findings but shall make all denials as specific denials of designated findings. For each finding which Arsynco denies, Arsynco shall allege the fact or facts as Arsynco believes such fact or facts to be;
 - d. Information supporting the request and specific reference to or copies of all written documents relied upon to support the request;

- e. An estimate of the time required for the hearing (in days and/or hours); and
- f. A request, if necessary, for a barrier-free hearing location for physically disabled persons.

GENERAL PROVISIONS

- 16. Neither the issuance of this Administrative Order and Notice of Civil Administrative Penalty Assessment nor anything contained herein shall relieve Arsynco of the obligation to comply with all applicable laws, including but not limited to the statutes and rules cited herein.
- 17. This Administrative Order and Notice of Civil Administrative Penalty Assessment is binding on Arsynco, its agents, successors, assigns, any trustee in bankruptcy or other trustee, and any receiver appointed through a proceeding in law or equity.
- 18. Notice is given that violations of any statutes, rules or permits other than those herein cited may be cause for additional enforcement actions, either administrative or judicial. By issuing this Administrative Order and Notice of Civil Administrative Penalty Assessment the Department does not waive its right to initiate additional enforcement actions.
- 19. Obligations and penalties of this Administrative Order and Notice of Civil Administrative Penalty Assessment are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and the protection of the public health, safety, and welfare and are not intended to constitute debt or debts which may be limited or discharged in a bankruptcy proceeding.
- 20. Notice is given that pursuant to N.J.S.A. 13:1E-9e, the Department is authorized to assess a civil administrative penalty of not more than \$50,000 for each violation, and each day during which the violation continues constitutes an additional, separate and distinct offense.
- 21. Notice is further given that any person who violates the provisions of N.J.S.A. 13:1E-1 et seq. or any code, rule, or regulation promulgated pursuant thereto shall be liable to a penalty of not more than \$50,000 per day to be collected in a civil action, and any person who violates an administrative order issued pursuant to N.J.S.A. 13:1E-9c or a court order issued pursuant to N.J.S.A. 13:1E-9d, or who fails to pay a civil administrative penalty assessed pursuant to N.J.S.A. 13:1E-9e in full after it is due is subject upon order of a court to a civil penalty not to exceed \$100,000 per day of such violations.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

AND ENERGY

BY:

James K. Hamilton

Assistant Director Water and Hazardous Waste

Enforcement

JKH/tb

c: File
 Mayor's Office
 Health Dept.
 Joel Golumbek, USEPA Reg. II



P. O. Box 8 • Carlstadt, N. J. 07072 201-933-2323

November 13, 1992

Mr. Thomas Brady Metro Bureau 2 Babcock Place West Orange, NJ

07052

Dear Mr. Brady:

Enclosed is the required Verification of Compliance for Administrative Order dated October 21, 1992. In order to ensure that we maintain compliance with respect to drum management on site, our Environmental Department has issued the attached memorandum to all Supervisory Personnel.

Yours truly,

Dennis V. Space

President

.DVS/1t

Attach.

STATE OF NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT



VERIFICATION OF COMPLIANCE

IN THE MATTER OF	RSYNCO.	INC
ADMINISTRATIVE ORDI	ER '	

Complete, sign and date this Verification of Compliance and submit it by Certified Mail to:

New Jersey Department of Environmental Protection & Energy Netro Bureau of Water & Hazardous Waste Enforcement 2 Babcock Place Vest Orange, NJ 07052-5504

Provide a brief description below of actions taken to comply with the Administrative Order (attach additional sheets if necessary):

Arsynco is currently in compliance with all of the regulations alleged to have been violated in the Administrative Order issued to Arsynco on October 21, 1992.

	do hereby certify under penalty of law that I have personally
	on submitted in this document and all attachments. I believe the herein made are true, correct and complete. I am aware that
there are significant penalties for submi	tting false information, including the possibility of fine and
imprisonment. Dated this day	, 19 <u>92</u> .
•	·
	0 0 11/1
James P. Dillon	Signature Signature
Name (type or print)	Signature
•	VP-Comp From 8 Page ASS
•.	VP-Corp. Env. & Reg. Affairs Mgr.

TO: ALL DEPARTMENT MANAGERS & SUPERVISORS

FROM: JIM DILLON- VICE PRESIDENT/ENVIRONMENTAL REGULATORY AFFAIRS MGR.

DATE: 11/2/92

SUBJECT: DRUM MANAGEMENT PROGRAM

The following procedures <u>must always be followed throughout</u>
all the drum storage areas at the Arsynco Inc. facility:

 All drums containing material must be in such condition, as to not allow leaking and/or spillage on to the ground and/or the mecadem. They must also be securely closed and sealed tight so as to prevent the escape of its contents or its vapors.

NOTE: Empty drums must also be sealed tight to prevent the entry of rain water or other contaminants.

- 2. All material(s) in a drum(s) must be properly identified and the drums(s) labeled and stored according to Local, State and Federal Regulations.* Any drum(s) containing unknown material must be labeled "CONTENTS UNKNOWN" and be reported immediately to the Health Safety & Environmental Department for sampling and storage instructions. NOTE: If you have any questions and/or need assistance to assure compliance with regulatory labeling and storage requirements contact the HS&E Department immediately.
- 3. All drums containing material must be arranged in such a manner that the identification label for said containers are visible. Aisle space should be maintained with sufficient space i.e., 36"(inches), for the unobstructed movement of personnel and/or fire protection, spill control and decontamination equipment in an emergency.

I've called your attention to the items noted above to reiterate the importance of protecting the health and safety of personnel (both on and off site) and the surrounding environment. The drum management program is on-going

and all its elements must be strictly abhered to. Any problem or problem(s) must be noted appropriately on the daily Yard/Inspection Report or Hazardous Waste Drum Storage Area daily report and corrected immediately.

If you have any questions or need any assistance in carrying out this "Program" please refer them to the Health Safety & Environmental Department immediately.

ND

cc: D.Space

July hulid



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

January 11th, 1993

Mr. Thomas Brady NJ Department of Environmental Protection and Energy Div. of Hazardous Waste Management 2 Babcock Place West Orange, NJ 07052

RE: Administrative Order
Date October 21st, 1992

Dear Mr. Brady:

As requested at the meeting held on 12/8/92, enclosed is a list of the non current material inventory in the yard storage areas we discussed. Please note that the disposition and corresponding target date for each material is also listed.

It is the intent of Arsynco Inc. to follow the disposition and meet the target dates on these materials; however, both are subject to change due to marketing conditions and/or other curcumstances beyond the control of Arsynco Inc. Should that be the case, Arsynco Inc. will notify you or if you prefer we can discuss a method of periodically keeping you abreast of the situation.

Please let me know if we can be of further assistance. If so you can contact me at 201 - 933 - 2323 ext. 270.

Sincerely,

James P. Dillon

James P. Willin

V.P. Environmental & Reg. Affairs Mgr. .

JPD/nd

cc: D.Space

P. Herzberg

P. T. Lynch (DEPE)



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

February 17th, 1993

Mr. Thomas Brady N.J. Department of Environmental Protection & Energy Division of Hazardous Waste Mgt. 2 Babcock Place West Orange, New Jersey 07052

RE: Administration Order
Dated October 21st, 1992
Non current Inventory List

Dear Mr. Brady:

Enclosed is an updated list of the non current material inventory in the yard storage areas, as of 2/10/93. If you compare it to the original list dated 1/11/93, you will find that twenty-three (23) items are no longer in storage. They have either been used, sold or declared waste and disposed of in compliance with all State and Federal regulations. You will also find that three (3) items located in TK-17 have been declared "non current" and added to the list.

If you have any questions or I can be of further assistance, please contact me at 201 - 933 - 2323 ext. 270.

P 348 524 539

	Certified Mail						
	No Insurance Coverage Provided						
POSTAL SERVICE	Do not use for International Mail (See Reverse)						
you to M	r. Thomas Brady						
NJDEPE	-Div of Haz Waste Mgt						

Receipt for

Special Delivery Fee

lestricted Delivery Fee
lettrin Receipt Snowing to Whom & Date Delivered

Note The Postage & \$0.50

Include the structure of the structur

Sincerely,

James P. Dillon

V.P./Environmental & Regulatory
Affairs Manager

Demes Phillin



State of New Jersey Department of Environmental Protection and Energy

Division of Responsible Party Site Remediation CN 028 Trenton, NJ 08625-0028

Scott A. Weiner Commissioner

Karl J. Delaney Director

JAN 15 1993 .

Certified Mail
Return Receipt Requested
No. P258810529

Mr. James Dillion Vice President Arsynco Incorporated Foot of 13th Street Carlstadt, NJ 07072

Dear Mr. Dillion:

The New Jersey Department of Environmental Protection and Energy is authorized, pursuant to the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq., to collect all costs associated with a discharge and incurred by the state in the removal of hazardous substances or mitigation of damages. Accordingly, oversight costs (salary, materials and indirect cost), in the amount of \$11,099.54 were incurred by the Department on the following site: Arysnco Incorporated, Foot of 13th Street Carlstadt. Billing period 3/13/91 through 11/13/92.

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have been caused by the discharge. Your payment of this amount merely satisfies the Department's interest in recovering its actual costs of the above referenced site.

Payment shall be made by check or money order payable to "Treasurer, State of New Jersey" within 30 days after receipt of this notice. Please send your check and the white copy of the attached Form DEP-062A to:

Neceved 122/93

pay 2/2/93 (seving)

New Jersey Department of Environmental
Protection and Energy
Bureau of Revenue
CN 417
Trenton, NJ 08625-0417

New lersev is an Equal Opportunity Employer

Should you have questions concerning this matter, please contact Mr. Yacoub E. Yacoub at (201) 669-3960.

Sincerely,

Kathleen M. Wooley

Administrative Assistant Administrative Support Unit

Enclosures

c: Y. Yacoub, MFO

ARSYNCO, CARLSTADT/9103131619
ANALYSIS OF EXPENDITURES
TIME PERIOD COVERED: 03/13/91 THROUGH 86/36/92

FY	SALARIES	X	ADDITIVE	SUBTOTAL	%	FRINGE	SUBTOTAL	×	INDIRECT	TOTAL
1991 1992 1993	\$677.26 \$1,863.71 \$464.53	23.22% 22.28% 22.00%	\$157.26 \$415.23 \$102.20	\$834.52 \$2,278.94 \$566.73	28.65% 28.65% 29.35%	\$239.09 \$652.92 \$166.33	\$1,073.61 \$2,931.86 \$733.06	134.24% 134.24% 134.24%	\$1,441.21 \$3,935.73 \$984.06	\$2,514.82 \$6,867.59 \$1,717.12
, т	OTAL CASE MANAG	EMENT TEAM	1 COSTS						•	\$11,099.54
PART B:	DIRECT COSTS			•						\$0.00
		:								
TOTAL S	ITE CLEANUP COS	TS.	•							\$11,099.54
*****	*****	*****	****	****	*****	****	****	****	*****	****
COST RE	COVERIES TO DAT	E		•						\$0.00
****	******	****	*****	******	*****	******	*****	*****	****	****
PREPARE	BY ADMINISTRA	TIVE SUPPO	ORT UNIT	ACRMF067						1/13/93

1					
DEP-062A 10/91	New Jer	ENFORCEMENT		Energy	Document # Date Rec'd Amount
DIVISION DRPSR - PROGRAM Dischar	o				
	Arsynco Incorpor Foot of 13th Str Carlstadt, NJ ATTN: James Di	reet	1 —	Regional	Industrial Commercial Other -
DATE ASSESSED		DESCRIPTION			AMOUNT
JAN 15 1993	11,099.54				
DATE DUE: 3	O days from recei	pt of invoice		AMOUNT DUE:	11,099.54

Make check payable to: Treasurer, State of New Jersey

Mail to: NJDEPE, Bureau of Revenue CN 417, Trenton, N.J. 08625-0417

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division

PITNEY, HARDIN, KIPP & SZUCH

(MAIL TO)

P. O. BOX 1945 MORRISTOWN, NEW JERSEY 07962-1945

(DELIVERY TO)

PETER J. HERZBERG 200 CAMPUS DRÎVE

FLORHAM PARK, NEW JERSEY 07932-0950

NEWARK OFFICE
33 WASHINGTON STREET
NEWARK, NEW JERSEY 07102
(201) 523-1980

FLORHAM PARK (201) 966-6300 NEW YORK (212) 926-0331

TELEX 642014

FACSIMILE (201) 966-1550

February 16, 1993

VIA UPS

DIRECT DIAL NUMBER

(201) 966-8058

Mr. James Dillon Arsynco Inc. Foot of 13th Street Carlstadt, NJ 07072

Re: Arsynco Inc.

Foot of 13th Street

Carlstadt, Bergen County

Dear Jim:

I am enclosing the invoices from the State of New Jersey that we discussed at the meeting. I am also sending a proposed draft letter to the State. Please get back to me approving same.

Very truly yours,

PETER J. HERZBERG

PJH:ag Enclosure

cc: Mr. Robert Parsont

February 16, 1993

Mr. Yacoub E. Yacoub Division of Responsible Party Site Remediation Department of Environmental Protection and Energy CN-028 Trenton, NJ 08625-0028

Re: Arsynco, Inc.

Foot of 13th Street

Carlstadt, Bergen County, New Jersey Billing Period: 3/13/91 - 11/13/92

Dear Mr. Yacoub:

This firm represents Arsynco, Inc. and is receipt of an invoice in the amount of \$11,099.54 allegedly for "costs associated with a discharge and incurred by the state and the removal of hazardous substances or mitigation of damages". At this time, we are reviewing this invoice. We would appreciate it if you could provide us with all the back-up time entries for the hours of work claimed. This will enable us to better analyze the invoice.

Thank you very much for your cooperation.

Very truly yours,

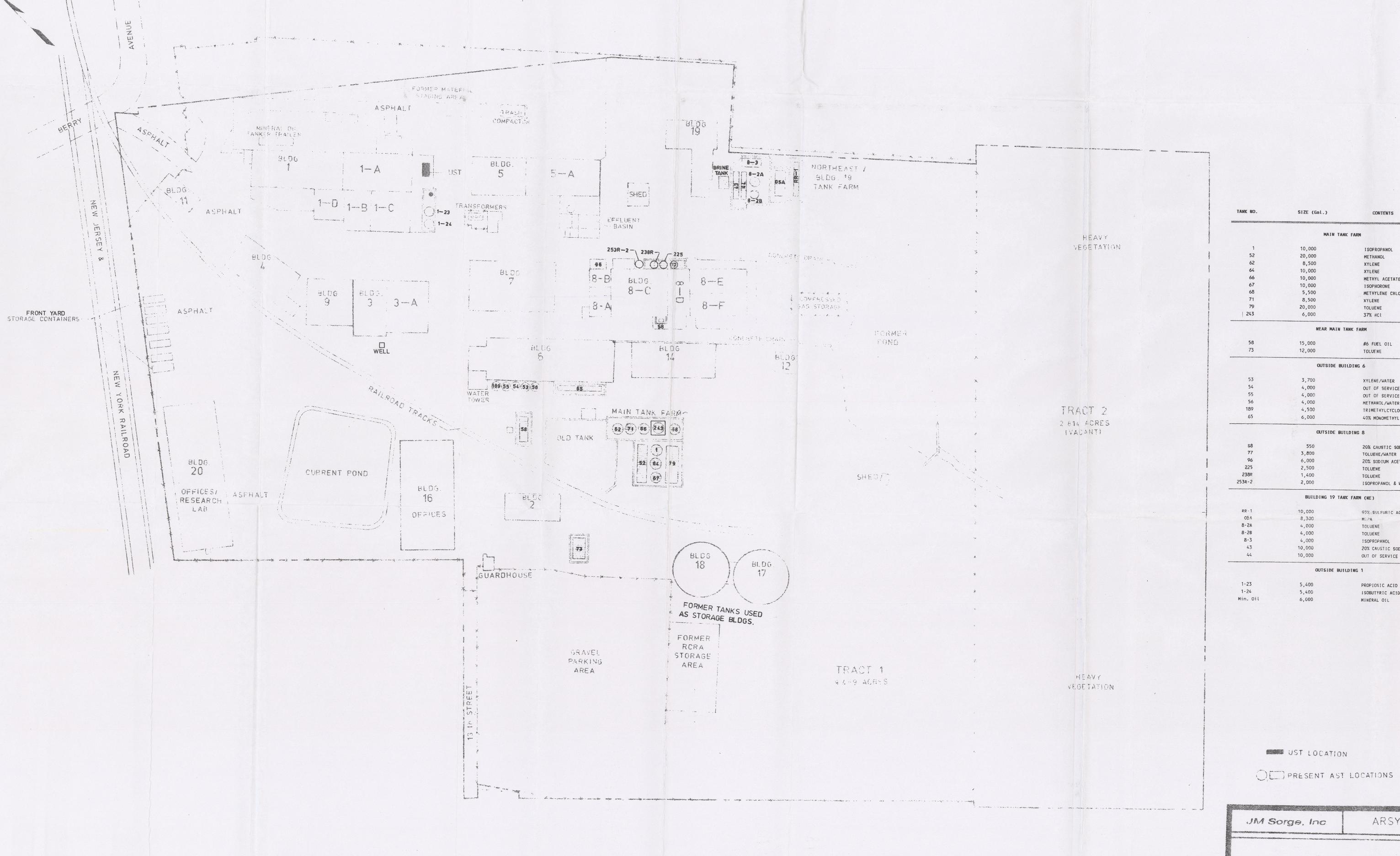
PETER J. HERZBERG

PJH:ag Enclosure

bcc: Mr. Dennis Space

ATTACHMENT F

SITE MAP (ITEM 4. OF SES)



TARK NO.	SIZE (Gal.)	CONTENTS
	MAIN TAI	NK FARM
1	10,000	ISOPROPANOL
52	20,000	METHANOL
62	8,500	XYLENE
64	10,000	XYLENE
66	10,000	METHYL ACETATE
67	10,000	ISOPHORONE
68	5,500	METHYLENE CHLORIDE
71	8,500	XYLENE
79	20,000	TOLUENE
243	6,000	37% HC1
	MEAR MAIN	TANK FARM
58	15,000	#6 FLEL OIL
73	12,000	TOLUENE
	OUTSIDE BU	FILDING 6
53	3,700	XYLENE/WATER
54	4,000	OUT OF SERVICE
55	4,000	OUT OF SERVICE
56	4,000	METHANOL/WATER
189	4,500	TRIMETHYLCYCLOHEXANOL
65	6,000	40% MONOMETHYL AMINE
	OUTSIDE BU	ILDING 8
S8	55 0	20% CAUSTIC SODIUM HYDROXIO
77	3,800	TOLUENE/WATER
96	6,000	20% SODIUM ACETATE
225	2,500	TOLUENE
238R	1,400	TOLUENE
253R-2	2,000	ISOPROPANOL & WATER
	BUILDING 19 TAI	NK FARM (NE)
RR - 1	10,000	93% SULFURIC ACID
05A	8,300	MIPA -
8-2A	4,000	TOLUENE
8-28	4,000	TOLUENE
8-3	4,000	ISOPROPANOL
43	10,000	20% CAUSTIC SODIUM HYDROXID
44	10,000	OUT OF SERVICE
	OUTSIDE BUI	ILDING 1
1-23	5,400	PROPIONIC ACID
1-23 1-24	5,400 5,400	PROPIONIC ACID ISOBUTYRIC ACID

ARSYNCO

SITE PLAN

ATTACHMENT G

DESCRIPTION OF OPERATIONS (ITEM 5. OF SES)

ATTACHMENT G

DESCRIPTION OF OPERATIONS

ARSYNCO, INC. CARLSTADT, NJ

Arsynco has owned and operated the property known as Block 91, Lot 1 since 1969. As discussed in Attachment B, the property has been owned and operated by a number of chemical companies dating back to approximately the 1920s; these previous chemical companies conducted operations similar in nature to Arsynco. As shown on the facility Site Plan (Attachment F), the eastern portion of the property is known as Block 91, Lot 1, Tract 2. This section consists of approximately 2.8 acres and, due to constant ponding and flooding, this land has never been used by Arsynco and remains vacant. The main portion of the Arsynco property, known as Block 91, Lot 1, Tract 1, consists of approximately 9.5 acres of land. This section of the property contains all production operations and accommodates a total of 17 buildings of various sizes.

The main entrance/exit to the Arsynco facility is located on the south side of the site, at the end of 13th Street. A secondary entrance/exit is located on the northwest corner of the site, along the Berry Street extension. The majority of all deliveries to the facility occur through the 13th Street entrance.

Arsynco, Inc. is involved in the manufacture of specialty organic chemicals and pharmaceutical intermediates such as salts of phenylpropanolamine for inclusion in products such as Contact and Alka Seltzer Plus, propylene imine and derivatives, hair dyes (aromatic amines), silicone intermediates, a quarternary ammonium salt, propiophenone and isobutyrophenone. Operations are batchtype in nature, and batch sizes range from 200 to 3,000 pounds. A majority of the operations are manual. However, the steam and vacuum components of the processes are semi-automatic. Reactor vessels range in size from 200 to 2,000 gallons. Heat is supplied from steam, electricity or oil. After a manufacturing order is initiated, a batch schedule is completed and operating procedures are issued. A log sheet is maintained for every batch operation and must include all relevant process data (quantities, dates, etc.).

Raw materials are delivered to the site in a variety of containers including tank wagon, steel, plastic and fiber drums, bags, gas cylinders, bottles, cans etc. The facility also has numerous aboveground storage tanks for the bulk storage of certain process chemicals. There are two (2) major, diked tank farms at the site and numerous other vessels located inside and outside the site buildings. The exact size, contents and location of all tanks is

described in Attachment H. Raw materials, as well as intermediates and finished products, are stored at both designated indoor and outdoor locations, depending on the use and need for accessibility.

The hazardous waste storage area is located on the north side of Building #20 (Attachment F). This area is covered entirely with macadam, and has been in use since approximately 1991. Hazardous wastes had previously been stored in the former RCRA storage area located on the south side of the site.

All wastewater generated at the site from process operations (i.e., reaction water from process vessels and cleaning of vessels) and stormwater that collects in diked containment areas are routed to the facility wastewater treatment unit located on the south side of Building #5. The waste water is directed to the treatment unit via a series of floor drains and concrete lined troughs. Once wastewater enters the system, it progresses through a series of settling and skimming processes. The wastewater is then neutralized and directed to an air stripper for removal of volatile compounds. The composition of the water from the unit is monitored manually (continuous pH is measured automatically) and is discharged to the POTW operated by the Bergen County Utilities Authority (BCUA).

The following presents a brief description of the specific uses for each of the site buildings.

BUILDING #1

The northeast end of Building #1 is used for the storage of various raw materials used throughout the facility. The main portion of the building is used for the production of the following:

- Propiophenone and Isobutyrophenone The basic raw materials for the processes which produce these materials are benzoic acid, mineral oil, a proprietary catalyst and propionic acid (for propiophenone) or isobutyric acid (for isobutyrophenone). These materials undergo a chemical reaction to yield the corresponding crude ketone. Crude propiophenone is purified in Building #1 via vacuum distillation and is packaged for shipment or internal use. Crude isobutyrophenone is purified via vacuum distillation in Building #6 and packaged for shipment.
- o <u>Methyl Aziridine Phosphine Oxide (MAPO)</u> Crude MAPO (see Building #6) is "degassed" and purified via high vacuum continuous distillation, then is sent to Building #4 for packaging and shipment.

- o <u>Quat D.S.</u> a-chloromethyl napthalene is reacted with lauryl dimethylamine using water as a solvent to yield Quat D.S. The resulting warm solution is clarified and cooled to room temperature. The crystalline product is isolated from the water liquor via centrifugation. The remaining water is removed from the wet solids in a double cone drier at 45° to 55° C under 40 mm Hg vacuum. The dry powder is then granulated to remove any large lumps and is packaged for shipment.
- o <u>Hair Dye 022B</u> Intermediate 022A (see Bldg. #8) is reacted with mono ethanol amine in water at reflux (100° C) to yield 022B. The resulting solution is cooled to 20° to 25° C. The crystalline product is isolated from the water liquor via centrifugation. The wet solids are then tray dried at 60-70° C to remove the last trace of water. The dried solids are packaged and sent to Building #3 for milling and packaged for shipment (see Bldg. #3).
- Falba In this process, white mineral oil, paraffin wax, bees wax, wool wax and lanolin are mixed in a tank at 65 to 80° C. The resulting solution is clarified (hot) and packaged in plastic-lined, 55-gallon steel drums and/or 5-gallon, plastic-lined steel pails, and sent to Building #4 for shipment.

Building #2, located on the south side of the site near the 13th Street entrance/exit, is used for the preparation of small size shipments and storage of finished products including SIMA, salicylic acid and salts of phenyl propanolamine. Cylinders containing inert gas (air, nitrogen, etc.) are stored next to the entrance to the building.

BUILDING #3

Building #3 is used for milling, packaging and storage of hair dye - 022B prior to shipment (see Bldg. #1).

BUILDING #4

Building #4 is used for the facility's shipping and receiving departments. Nearly all packaged raw materials are received at Building #4, and all finished product is shipped from this location. This building is also used for the packaging and storage

of small quantities of MAPO (see Bldg. #1), Propylene imine (see Bldg. #19) and other products manufactured throughout the facility.

BUILDING #5

Building #5 is located at the north side of the site and is used for the processing of solids. The processes conducted in Building #5 include drying and milling propanolamine hydrochloride (PPA·HCl) and hair dyes P-132 and P-148 (see Bldg. #8). Development of small size batches of specialty items are also dried, milled or granulated in this building, as the need may arise. PPA·HCl is dried in a rotary drier above 110° C. All other products are tray dried at 60 to 70° C. These products are also packaged for shipment at this location.

BUILDING #6

Building #6 is used for the manufacture of liquid chemicals including isobutyrophenone, MAPO, N-Methyl Acetamide, SIMA, HMS and TMC (pure) and melilotin. The following presents a brief description of the processes:

- o <u>Isobutyrophenone</u> See Building #1.
- o MAPO The basic raw materials used in this process are propylene imine, phosphorous oxychloride, sodium hydroxide, water and methylene chloride. These materials are manipulated and put through various reactions to form MAPO Crude. The MAPO is packaged in 55-gallon drums and sent to Building #1 for purification (see Bldg. #1).
- N-Methyl Acetamide The basic raw materials used in this process are methyl acetate and 40% aqueous mono methylamine. These compounds are reacted to form N-Methyl Acetamide and methanol dissolved in water. Methanol and water are removed via fractional distillation. N-Methyl Acetamide is then purified via vacuum distillation and packaged in 55-gallon drums for internal use and/or shipment as finished product.
- o <u>SIMA</u> (Methyl-Vinyl bis(N-Methyl-acetamido) Silane). The basic raw materials used in this process are N-Methyl Acetamide, sodium methylate, methyl vinyl dichloro silane and xylol. These compounds are manipulated and put through a series of chemical reactions to form SIMA in xylol. The xylol is distilled off under vacuum, and the residual SIMA is filtered and packaged in 55-gallon drums for shipment.

- o <u>Homo Methyl Salicylate (HMS)</u> The basic raw materials for this process are methyl salicylate trimethyl cyclo hexanol (TMC see Bldg. #8), a proprietary catalyst, sodium hydroxide, water and phosphoric acid. The raw materials are manipulated and reacted to yield a mixture of HMS and TMC. The TMC is removed via fractional distillation. HMS is then purified via vacuum distillation and packaged in 55-gallon drums for shipment.
- o TMC (pure) and Melilotin See Building #8.

Building #7 contains the production offices and the QC lab. No manufacturing is conducted in this building. The QC lab is used for analyzing raw materials, in-process samples and finished goods. The majority of the samples analyzed in this building are returned to the plant operations, and all waste samples are placed into appropriate containers for either disposal (within 90 days) of recycling/recovery. The first aid room and a lunch room are also located in this building. Building #7 also houses the monitoring alarms for the effluent treatment basin.

BUILDING #8

Building #8 is used for the manufacture of both solid and liquid chemicals including intermediate - 022A, hair dyes P-132 and P-148, PPA HCl, TMC-crude and melilotin crude. The following presents a brief description of the processes used in the manufacture of each material:

- o <u>Intermediate 022A</u> p-nitro floro aniline and ethylene oxide (E>O) are reacted (using water as a solvent) under approximately 15-20 PSIG to form 022A. Unreacted E>O is removed from the reactions mass via distillation and converted to ethylene glycol by acid hydrolysis. Wet 022A is isolated from the water liquor via centrifugation, packaged and sent to Building #1 to be used to manufacture hair dye 022B.
- hair dyes P-132 and P-148 The basic raw materials for these processes are m-ethanolamine, o-chloro nitro benzene (for P-132) and p-nitro floro aniline (for P-148). Water is used as a solvent in both procedures. The amine and halogenated compound undergo a chemical reaction to form the hair dye. The crystalline product is then isolated from the water liquor via centrifugation, packaged and sent to Building #5 for drying, milling and packaging for shipment.

- o Phenyl Propanolamine Hydrochloride (PPA·HCl) The basic raw materials used in this production process are propiophenone, sodium nitrite, methanol, sulfuric acid, hydrogen chloride, water, a proprietary catalyst, isopropyl alcohol, sodium hydroxide, toluene and muriatic acid. The raw materials are manipulated and put through a series of various reactions to form "wet" PPA·HCl which is sent to Building #5 for drying, milling and packaging. The solvents used in this process (IPA and toluene) are recovered and recycled for use in the process. The waste generated form the process is disposed of in accordance with all Federal, State and local regulations.
- o <u>TMC-Crude</u> Raw materials include isophenone, hydrogen and a proprietary catalyst. These materials are reacted under hydrogen pressure to form TMC-Crude. The product is clarified and transferred via pump to a storage tank outside Building #6 for use in HMS manufacture, or the product is purified via vacuum distillation and packaged for shipment.
- o <u>Melilotin Crude</u> The basic raw materials for this process are coumarin, hydrogen and a proprietary catalyst. These materials are reacted under hydrogen pressure to form Melilotin Crude. The product is clarified and sent in 55-gallon drums to Building #6 for purification via vacuum distillation and packaged for shipment.

Building #9 is connected to Building #3 (considered the same building) and is also used for storage of phenyl propanolamine, resale items (methyl and propyl paraben) and other products prior to shipment.

BUILDING #10

There is no Building #10.

BUILDING #11

Building #11, located on the north corner of the site, adjacent tot the Berry Street entrance/exit, is used for the storage of safety equipment and various supplies. No hazardous materials are stored in this building.

Building #12 is used to store maintenance supplies (glass, steel piping, etc.)

BUILDING #13

There is no Building #13.

BUILDING #14

Building #14 is used as the maintenance shop.

BUILDING #15

Building #15 is used as the guard house and is located adjacent to the 13th Street entrance/exit. This building also houses the facility's gas meter and air sampling pump for the LEL alarm on the effluent pipeline which is connected to the municipal sewer system (POTW-BCUA).

BUILDING #16

Building #16 is an office building and also contains the union employees lunch and locker room.

BUILDING #17 and BUILDING #18

Building #17 and Building #18 were formerly large capacity (150,000 gallon) aboveground storage tanks which were empty and abandoned long before Arsynco purchased the facility (prior to 1969). It is unknown what the tanks had been used for prior to Arsynco. The tanks are presently used as storage buildings. Permanent access doors were cut in each tank at the ground surface.

BUILDING #19

Building #19, located on the northeast portion of the site, is used for the production of Propylene Imine. The basic raw materials used in the production process are isopropanol amine, sulfuric acid, xylene, sodium acetate solution and sodium hydroxide. The raw materials are manipulated and put through various reactions to form Propylene Imine. The xylene is a solvent and is used to keep a solid intermediate (isopropanol amine sulfate)

dispersed during the manufacturing process. The recoveries generated from this process are temporarily staged in steel drums and later recycled for use in the processes.

BUILDING #20

Building #20 is located on the western portion of the site, and houses the offices of the Engineering and Regulatory Affairs (Health, Safety and Environmental) Departments, the Arsynco, Inc. Technical library and the analytical development laboratory. In the analytical development laboratory, R&D materials are analyzed, and procedures for the QC laboratory are developed.

ATTACHMENT H

HAZARDOUS SUBSTANCE AND WASTE CONTAINMENT DESCRIPTION (ITEM 8. OF SES)

PAGE 1 of 6

TYPE OF STORAGE UNIT	DATE INSTALLED	AREA OR VOLUME	MATERIAL STORED	CONSTRUCTION TYPE	LOCATION REFERENCE	DECOM: PLAN OR SAP REFEREN
Feed Tank	Prior to 1969	500 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Caustic Wash Tank	1986	400 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Aux. Feed Tank	1988	200 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Reactor Tank	1986	90 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm, Plan
Holding Tank	1986	85 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Reactor Tank	1986	90 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Holding Tank	1986	100 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Reactor Tank	1988	100 gal	Organic Chemicals	Stainless Steel ,	Bldg. 1	Decomm. Plan
Holding Tank	1988	75 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Reactor Tank	1990	100 gal	Organic Chemicals	Stainless Steel (316)	Bldg, 1	Decomm, Plan
Holding Tank	1990	125 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Still	1988	1000 gal	Organic Chemicals	Stainless Steel (316)	Bldg. 1	Decomm, Plan
Still	1991	1500 gal	Organic Chemicals	Stainless Steel (316)	Bldg. 1	Decomm. Plan
Distil. Resv.	1991	1000 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm, Plan
Distil. Resv.	1991	500 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Distil. Resv.	1991	150 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Distil. Resv.	1992	150 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Distil. Resv.	1992	150 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Holding Tank	1991	1000 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm, Plan
Reactor Tank	1992	1000 gal	Organic Chemicals	Glass Lined	Bidg. 1	Decomm, Plan
Reactor Tank	Prior to 1969	200 gal	Organic Chemicals	Glass Lined	Bldg. 1	Decomm, Plan
Reactor Tank/Still	1989	200 gal	Organic Chemicals	Stainless Steel (316)	Bldg. 1	Decomm. Plan
Distil. Resv.	1989	100 gal	Organic Chemicals	Stainless Steel (316)	Bldg. 1	Decomm, Plan
Oil Wash Tank	1978	500 gal	Organic Chemicals	Glass Lined	Bldg. 1	Decomm, Plan
Crystallizer	Prior to 1969	500 gal	Organic Chemicals	Glass Lined	Bldg. 1	Decomm. Plan
Reactor Tank	1989	75 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm, Plan
Storage Tank	1986	2500 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Storage Tank	1986	2000 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm. Plan
Storage Tank	1986	1:500 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm, Plan
Storage Tank	1991	1000 gal	Organic Chemicals	Stainless Steel	Bldg. 1	Decomm, Plan
Still	1977	1.2 sq ft	Organic Chemicals	Stainless Steel (316)	Bldg. 1	Decomm. Plan

TYPE OF STORAGE UNIT	DATE INSTALLED	AREA OR VOLUME	MATERIAL STORED	CONSTRUCTION TYPE	LOCATION REFERENCE	DECOM: PLAN OR SAP REFEREN
Distil. Resv.	1988	300 gal	Organic Chemicals	Stainless Steel	Bldg. 5	Decomm. Plan
Reactor Tank/Still	Prior to 1969	1000 gal	Organic Chemicals	Glass Lined	Bldg. 6	Decomm. Plan
Distil. Resv.	1992	300 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Still	1992	1250 gal	Organic Chemicals	Stainless Steel(316)	Bldg. 6	Decomm. Plan
Distil. Resv.	1992	300 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Distil, Resv.	1992	500 gal	Organic Chemicals	Carbon Steel	Bldg. 6	Decomm. Plan
Still	Prior to 1969	500 gal	Organic Chemicals	Glass Lined	Bldg. 6	Decomm. Plan
Distil. Resv.	Prior to 1969	200 gal	Organic Chemicals	Glass Lined	Bldg. 6	Decomm. Plan
Reactor	Prior to 1969	1500 gal	Organic Chemicals	Stainless Steel (304)	Bldg. 6	Decomm. Plan
Still	Prior to 1969	1500 gal	Organic Chemicals	Stainless Steel (304)	Bldg. 6	Decomm. Plan
Distil. Resv.	1987	200 gai	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Distil. Resv.	1987	200 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Distil. Resv.	1987	200 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Blend Tank	1992	300 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Reactor	1992	1000 gal	Organic Chemicals	Stainless Steel (304)	Bldg. 6	Decomm. Plan
Reactor	Prior to 1969	2000 gal	Organic Chemicals	Glass Lined	Bldg. 6	Decomm. Plan
Still	Prior to 1969	300 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Still	Prior to 1969	600 gal	Organic Chemicals	Steel	Bldg. 6	Decomm. Plan
Still	Prior to 1:969	550 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Still	Prior to 1969	500 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Distil, Resv.	Prior to 1969	85 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Distil. Resv.	Prior to 1969	50 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Still	1992	1000 gal	Organic Chemicals	Glass Lined	Bldg. 6	Decomm, Plan
Distil. Resv.	1992	250 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Distil. Resv.	1992	2000 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Salt Wash Tank	1992	2000 gal	Organic Chemicals	Stainless Steel(304)	Bldg. 6	Decomm, Plan
Decanter	1992	1500 gal	Organic Chemicals	Stainless Steel (304)	Bldg. 6	Decomm, Plan
Decanter	1992	1500 gal	Organic Chemicals	Stainless Steel (304)	Bldg. 6	Decomm. Plan
Distil. Resv.	Prior to 1969	225 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Distil. Resv.	Prior to 1969	100 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Distil. Resv.	Prior to 1969	200 gal	Organic Chemicals	Glass Lined	Bldg. 6	Decomm. Plan

TYPE OF STORAGE UNIT	DATE INSTALLED	AREA OR VOLUME	MATERIAL STORED	CONSTRUCTION TYPE	LOCATION REFERENCE	DECOM: PLAN OR SAP REFEREN
Holding Tank	Prior to 1969	4000 gal	Organic Chemicals	Iron	Bldg. 6	Decomm. Plan
Holding Tank	Prior to 1969	1200 gal	Organic Chemicals	Aluminum	Bldg. 6	Decomm. Plan
Holding Tank	Prior to 1969	600 gal	Organic Chemicals	Iron	Bldg. 6	Decomm. Plan
Holding Tank	1992	1:500 gal	Organic Chemicals	Stainless Steel(304)	Bldg. 6	Decomm. Plan
Holding Tank	1992	1:500 gal	Organic Chemicals	Stainless Steel (304)	Bldg. 6	Decomm, Plan
Storage Tank	1992	1000 gal	Organic Chemicals	Stainless Steel	Bldg. 6	Decomm. Plan
Storage Tank	1992	3000 gal	Organic Chemicals	Stainless Steel(304)	Bldg. 6	Decomm. Plan
Storage Tank	1992	3000 gal	Organic Chemicals	Stainless Steel(304)	Bldg. 6	Decomm, Plan
Holding Tank	Prior to 1969	600 gal	Organic Chemicals	Iron	Bldg. 6	Decomm, Plan
Hydrogntr	Prior to 1969	2000 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm, Plan
Wash Tank	1970	500 gal	Organic Chemicals	Iron	Bldg. 8	Decomm. Plan
Still	1986	1000 gal	Organic Chemicals	Stainless Steel(316)	Bldg. 8	Decomm, Plan
Reactor	1986	150 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm, Plan
Reactor	1970	1000 gal	Organic Chemicals	Glass Lined	Bldg. 8	Decomm, Plan
Dissolve Tank	1970	300 gal	Organic Chemicals	Glass Lined	Bldg. 8	Decomm, Plan
Reactor	1991	1000 gal	Organic Chemicals	Glass Lined	Bldg. 8	Decomm. Plan
Reactor	1977	1000 gal	Organic Chemicals	Glass Lined	Bldg. 8	Decomm. Plan
Feed Tank	1991	2500 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Still	1991	1500 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Wash Tank	1970	1000 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Reactor	1970	750 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Crystallizer	1988	500 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Still	1986	2000 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Distil. Resv.	1991	2000 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Distil, Resv.	1991	750 gal	Organic Chemicals	Carbon Steel	Bldg. 8	Decomm, Plan
Distil, Resv.	1991	300 gal	Organic Chemicals	Carbon Steel	Bldg, 8	Decomm. Plan
Crystallizer	1988	1000 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Holding Tank	1970	1200 gal	Organic Chemicals	Stainless Steel(316)	Bldg. 8	Decomm. Plan
Hydrogntr	1991	500 gal	Organic Chemicals	Stainless Steel(316)	Bldg. 8	Decomm. Plan
Hydrogntr	1991	500 gal	Organic Chemicals	Stainless Steel(316)	Bldg. 8	Decomm. Plan
Feed Tank	1970	100 gal	Organic Chemicals	Glass Lined	Bldg. 8	Decomm. Plan

PAGE 4 of 6

TYPE OF STORAGE UNIT	DATE INSTALLED	AREA OR VOLUME	MATERIAL STORED	CONSTRUCTION TYPE	LOCATION REFERENCE	DECOM: PLAN OR SAP REFEREI
Feed Tank	1.991	500 gal	Organic Chemicals	Carbon Steel	Bldg. 8	Decomm. Plan
Feed Tank	1991	300 gal	Organic Chemicals	Stainless Steel (316)	Bldg. 8	Decomm. Plan
Feed Tank	1991	150 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Hydrogntr	1986	150 gal	Organic Chemicals	Steel	Bldg. 8	Decomm. Plan
Dissolve Tank	1991	300 gal	Organic Chemicals	Glass Lined	Bldg. 8	Decomm. Plan
Dissolve Tank	1/991	375 gal	Organic Chemicals	Stainless Steel(304)	Bldg. 8	Decomm. Plan
Recovery Tank	1991	500 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Crystallizer	1988	1000 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Hydrogntr	1970	350 gal	Organic Chemicals	Carbon Steel	Bldg. 8	Decomm. Plan
Feed Tank	1970	500 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm, Plan
Reactor	1970	100 gal	Organic Chemicals	Glass Lined	Bldg. 8	Decomm. Plan
Distil. Resv.	1988	500 gal	Organic Chemicals	Glass Lined	Bldg. 8	Decomm. Plan
Guard Tank	1992	3000 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan-
Crystallizer	1970	300 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Precipitation Tank	1979	2000 gal	Organic Chemicals	Resin No. 41	Bldg. 8	Decomm. Plan
Holding Tank	1991	1200 gal	Organic Chemicals	Carbon Steel	Bldg. 8	Decomm. Plan
Holding Tank	1991	1200 gal	Organic Chemicals	Carbon Steel	Bldg. 8	Decomm. Plan
Distil, Resv.	1982	2000 gal	Organic Chemicals	Stainless Steel	Bldg. 8	Decomm. Plan
Storage Tank	1982	4000 gal	Organ/Inorgan Chem	Carbon Steel	Bldg. 8	Decomm. Plan
Salt-out Tank	1988	500 gal	Organic Chemicals	Stainless Steel	Bldg. 19	Decomm. Plan
Salt-out Tank	1987	500 gal	Organic Chemicals	Stainless Steel	Bldg. 19	Decomm. Plan
Distil, Resv.	1987	500 gal	Organic Chemicals	Carbon Steel	Bldg. 19	Decomm. Plan
Causticizer	1987	1000 gal	Organic Chemicals	Iron	Bldg. 19	Decomm. Plan
Causticizer	1970	1000 gal	Organic Chemicals	Carbon Steel	Bldg. 19	Decomm. Plan
Holding Tank	1:986	1000 gal	Organic Chemicals	Stainless Steel	* Bldg. 19	Decomm. Plan
Still	1990	500 gal	Organic Chemicals	Steel	Bldg. 19	Decomm. Plan
Distil, Resv.	1988	110 gal	Organic Chemicals	Steel	Bldg. 19	Decomm. Plan
Distil. Resv.	1988	110 gal	Organic Chemicals	Steel	Bldg. 19	Decomm. Plan
Still	1990	500 gal	Organic Chemicals	Stainless Steel	Bldg. 19	Decomm. Plan
Drum Storage Area	Prior to 1969	480 sq ft	Organic Chemicals	Asphalt	S of Bldg. 1	Both
Drum Storage Area	Prior to 1969	240 sq ft	Organic Chemicals	Asphalt	W of Bldg. 1	Both

PAGE 5 of 6

TYPE OF STORAGE UNIT	DATE INSTALLED	AREA OR VOLUME	MATERIAL STORED	CONSTRUCTION TYPE	LOCATION REFERENCE	DECOM PLAN OR SAP REFEREN
Drum Storage Area	Prior to 1969	450 sq ft	Organic Chemicals	Unpaved	SE of Bldg. 2	Both
Drum Storage Area	Prior to 1969	550 sq ft	Organic Chemicals	Asphalt	E of Bldg. 4	Both
Drum Storage Area	Prior to 1969	2100 sq ft	Organic Chemicals	Asphalt	W of Bldg. 4	Both
Drum Storage Area	Prior to 1969	900 sq ft	Organic Chemicals	Asphalt	S of Bldg. 5	Both
Drum Storage Area	Prior to 1969	280 sq ft	Organic Chemicals	Unpaved	S of Bldg. 6	Both
Drum Storage Area	Prior to 1969	200 sq ft	Organic Chemicals	Unpaved	S of Bldg. 6	Both
Drum Storage Area	Prior to 1969	300 sq ft	Organic Chemicals	Asphalt	N of Bldg. 6	Both
Drum Storage Area	Prior to 1969	160 sq ft:	Organic Chemicals	Asphalt	S of Bldg. 6	Both
Drum Storage Area	Prior to 1969	200 sq ft	Organic Chemicals	Asphalt	N of Bldg. 8	Both
Drum Storage Area	Prior to 1969	320 sq ft	Organic Chemicals	Asphalt	N of Bldg. 8	Both
Drum Storage Area	Prior to 1969	280 sq ft	Organic Chemicals	Asphalt	S of Bldg. 9	Both
Drum Storage Area	Prior to 1969	650 sq ft	Organic Chemicals	Asphalt	E of Bldg. 19	Both
Drum Storage Area	Prior to 1969	2500 sq ft	Organic Chemicals	Asphalt	N of Bldg. 20	Both
Drum Storage Area	Prior to 1969	625 sq ft	Organic Chemicals	Asphalt	N of Bldg. 20	Both
Drum Storage Area	Prior to 1969	10000 sq ft/	Drummed Haz Waste	Unpaved	S of Bldg. 17/18	Both
AST	1992	10000 gal	Isophorone	Steel	Main Tank Farm	Both
AST	1970	20000 gal	Methanol	Steel	Main Tank Farm	Both
AST	1992	8500 gal	Xylene	Steel	Main Tank Farm	Both
AST	1992	10000 gal	Xylene	Steel	Main Tank Farm	Both
AST	1992	10000 gal	Methyl Acetate	Steel	Main Tank Farm	Both
AST	1992	10000 gal	Isopropanol	Steel	Main Tank Farm	Both
AST	1992	5500 gal	Methylene Chloride	Steel	Main Tank Farm	Both
AST	1992	8500 gal	Xylene	Steel	Main Tank Farm	Both
AST	1970	20000 gal	Toluene	Steel	Main Tank Farm	Both
AST	1992	6000 gal	37% HCI	Lined Steel	Main Tank Farm	Both
AST	1970	15000 gal	#6 Fuel Oil	Steel	W of Main Tank Farm	Both
AST	1970	12000 gal	Toluene	Steel	SE of Bldg. 2	Both
AST	1970	3700 gal	Xylene	Steel	S Side Bldg. 6	Both
AST	1970	4000 gal	Out of Service	Steel	S Side Bldg. 6	Both
AST	1970	4000 gal	Out of Service	Steel	S Side Bldg. 6	Both
AST	1970	4000 gal	Methanol/Water	Steel	S Side Bldg. 6	Both

PAGE 6 of 6

TYPE OF STORAGE UNIT	DATE INSTALLED	AREA OR VOLUME	MATERIAL STORED	CONSTRUCTION TYPE	LOCATION REFERENCE	DECOM: PLAN OR SAP REFEREN
AST	1970	4500 gal	TMCH	Steel	S Side Bldg. 6	Both
AST	1985	6000 gal	40% Monomethyl Amine	Steel	S Side Bldg. 6	Both
AST	1970	550 gal	20% Caustic Sod Hyd	Steel	S Side Bldg, 8	Both
AST	1970	3800 gal	Toluene/Water	Steel	N Side Bldg. 8	Both
AST	1970	6000 gal	20% Sodium Acetate	Steel	N Side Bldg. 8	Both
AST	1991	2500 gal	Toluene	Steel	N Side Bidg. 8	Both
AST	1991	1400 gal	Toluene	Steel	N Side Bldg. 8	Both
AST	1991	2000 gal	IPA/Water	Steel	N Side Bldg. 8	Both
AST	1970	10000 gal	93% Sulfuric Acid	Steel	NE Tank Farm	Both
AST	1970	10000 gal	20% Caustic Sod Hyd	Steel	NE Tank Farm	Both
AST	1970	10000 gal	Out of Service	Steel	NE Tank Farm	Both
AST	1982	4000 gal	Toluene	Steel	NE Tank Farm	Both
AST	1982	4000 gal	Toluene	Steel	NE Tank Farm	Both
AST	1970	4000 gal	IPA	Steel	NE Tank Farm	Both
AST	1970	8300 gal	MIPA	Steel	NE Tank Farm	Both
AST	1987	5400 gal	Propionic Acid	Lined Steel	E Side of Bldg. 1	Both
AST	1987	5400 gal	Isobutyric Acid	Lined Steel	E Side of Bldg. 1	. Both
AST	1.985	6000 gal	Mineral Oil	Steel	N Side of Bldg. 1	Both

ATTACHMENT I

HAZARDOUS SUBSTANCE/WASTE INVENTORY (ITEM 9. OF SES)

ITEM 9. (SES) Page 1 of 13

ATTACHMENT I
HAZARDOUS SUBSTANCE/WASTE INVENTORY
ARSYNCO, INC.
ECRA CASE # 93024

-	MATERIAL NAME	PHYSICAL STATE	QUANTITY (units)	LOCATION REFERENCE	STORAGE METHOD CONTAINER TYPE/SIZE	TYPIGAL ANNUAL USAGE	TO REMAIN ON SITE (YES OR NO)
1	Chlorobenzene	L (<100 lbs	Bldg. #7 (QC Lab) & Bldg. #20 (R&D Lab)	Glass Bottles	<2 lbs	NO
	Sulfuric Acid	L.	<100 lbs	Bldg. #7 (Q.C. Lab) & Bldg. #20 (R&D Lab)	Glass Bottles	<350 lbs	NO
	Sulfuric Acid	L .	<100 lbs	Bldg, #7 (Q.C. Lab) & Bldg. #20 (R&D Lab)	Plastic Bottles	<300 lbs	NO
	Benzoic Acid	S	<10 lbs	Bldg. #7 (QC Lab) & Bldg. #20 (R&D Lab)	Glass Bottles	<1 lb	NO
	Carbon Tetrachloride	L	<100 lbs	Bldg. #7 (QC Lab) & Bldg. #20 (R&D Lab)	Glass Bottles	<2 lbs	NO
	Acetone	L	<100 lbs	Bldg. #7 (QC Lab) & Bldg. #20 (R&D Lab)	Glass Bottles	<5 lbs	NO
	Acetone	L ·	<10 lbs	Bldg. #7 (QC Lab) & Bldg. #20 (R&D Lab)	Plastic Bottles	<2 lbs	NO
Φ	Zinc	S	<10 lbs	Bldg. #7 (Q.C. Lab) & Bldg. #20 (R&D Lab)	Glass Bottles	<1 lb	NO

ATTACHMENT J

DISCHARGE HISTORY OF HAZARDOUS SUBSTANCES & WASTES (ITEM 10. B. OF SES)



P.O Box 8 • Caristadt, N.J. 07072 201 • 933 • 2323

June 1st, 1989

Mr. Arnold Schiff, Investigator N.J. Department of Environmental Protection Div. of Hazardous Waste Management 2 Babcock Place West Orange, NJ 07052

Dear Sir:

On May 17th, 1989, we reported that a tank in our dike farm was overflowed. We were given a log # DWM-89-05-17-1255. We are supplying a written report of the over flowing of that tank.

I. MAME, ADDRESS, AND TELEPHONE # OF THE OWNER OR OPERATOR

Arsynco, Inc. Foot of 13th Street Carlstadt, NJ 07072

II. NAME, ADDRESS AND TELEPHONE # OF THE FACILITY

Arsynco, Inc. Foot of 13th Street Carlstadt, NJ 07072

III. DATE, TIME AND TYPE OF INCIDENT

Sometime in the early morning of May 17th, 1989, a tank in our tank farm was over filled resulting in the overflowing material being collected in our dike.

IV. NAME AND QUANTITY OF MATERIAL INVOLVED

Xylene, 100 Gallons

- V. THE EXTENT OF INJURIES, IF ANY HOME
- VI. AN ASSESSMENT OF ACTUAL OR FOTENTIAL HAZARDS TO HUMAN HEALTH OR THE ENVIRONMENT, WHERE THIS IS APPLICABLE

There were no actual or potential hazards to human health or the environment, since the xylene that overflowed was contained in the dike that was built to contain the material.

Mr. Arnold Schiff, Investigator (continued)

VII. ASSESSMENT OF THE SCOPE AND NAGNITUDE OF THE FROBLEM

Since the amount of the xylene that overflowed out of the tank was only a hundred gallons and it was contained in the dike and once discovered it was promptly pumped out using our emergency procedure, the scope and magnitude of the problem was small.

VIII. DESCRIPTION OF THE IMMEDIATE ACTIONS THAT HAVE BEEN TAKEN AND THE ESTIMATED QUANTITY AND DISPOSITION OF RECOVERED MATERIAL THAT RESULTED FROM THE OVERFLOWING OF THE TANK

Once discovered the xylene was promptly pumped out of dike. The recovered xylene was distilled and returned to our inventory of raw materials. The dirt in the dike that contained xylene will be removed, tested and disposed of if found contaminated following all local, state and federal regulations.

IX. PROVIDE IMPLEMENTATION SCHEDULE FOR UNDERTAKING SUGGESTED MEASURES TO ELIMINATE THE PROBLEM

SHORT TERM- Log is being kept of what is pumped to tank, operators cannot pump to tank until supervisor gives permission. Supervisor will make sure that there is room in the tank before pumping to the tank. (By having the tank sticked). IMPLEMENTED ALREADY

LONG TERM - Level controller will be installed

Sincerely yours,

WESLEY DENNETT

MGR. REGULATORY AFFAIRS



P.O. Box 8 • Carlstadt, N.J. 07072 201-933-2323

March 27th, 1991

Mr. Joseph E. Hoyle Jr.
New Jersey Department of
Environmental Protection
Bureau of Emergency Response
No. 2 Babcock Place
West Orange, New Jersey 07052

RE: Case No. 91-03-13-1519-18
Written Report of Incident
NJSA: 58:10-23.11 E-Spill
Compensation and Control Act

- I. Arsynco, Inc.
 Foot of 13th Street
 Carlstadt, New Jersey 07072
- II. Same as above
- III. Tuesday, March 12th, 1991 at 10:30 P.M. Accidental Discharge of a mixture of Salt water and xylene into bldg. #6 spill control drainage trench occurred initiating the emergency procedure for containment and clean up of oil and chemicals spills.
 - IV. Approximately 1500 gallons of Salt (NaCl) Water and 1500 gallons of Xylene.
 - V. There were no injuries.
 - VI. There were no actual or potential hazards to human health or the environment as a result of the discharge to the plant containment system. Procedures as specified in the Arsynco Spill Prevention Plan were initiated and affectively prevented the discharge of any hazardous material to the municipal sanitary sewer system.
- VII. The discharge was confined to the area immediately under H-600 (3000 gal mixing/settling tank) in bldg. #6, the spill control drainage trench from bldg. #6 to the effluent treatment basin and the effluent treatment basin.

VIII. On Tuesday March 12th at approximately 10:30 P.M. George Chattas, the 2nd Shift Production Supervisor was operating a forklift truck in the door way of Building #6 when the top of the truck accidentally hit the bottom valve on a 3000 gallon mixing/settling tank (H-600), breaking the nozzle above the valve and releasing salt water onto the truck and concrete floorsinto the spill control drainage trench situated under the tank. Mr. Ghattas recognizing that the tank contained a xylene phase floating above the salt water phase, immediately shut off the ignition on the truck and started washing down the truck and floor with water, directing the wash into the drainage trench.

At approximately 10:35 P.M. another production Supervisor, Numberto Armella, telephoned Mr. Jim Dillon, the Corporate Environmental & Regulatory Affairs / Manager and described the incident. Jim Dillon told Mr. Armella to continue to wash down the area, making sure to direct all liquid into the spill control drainage trench. Mr. Dillon advised Mr. Armella that he would be at the plant in approximately 10 minutes and in the interim he (Mr. Armella) should call Mr. Wesley Bennett (Environmental Consultant) and receive instructions for implementing the spill control plan for preventing immiscible liquids (xylene) from entering the municipal sewer line.

At approximately 10:50 P.M. Jim Dillon arrived at the plant and went immediately to the effluent basin area and observed that the spill control plan was in effect. George Ghattas and two operators were preparing drums for storage of xylene as it was separated from the basin by skimming equipment. He (Jim Dillon) checked to see that all the equipment designed to handle the situation was in working order and advised Mr. Ghattas to immediately take a one (1) quart sample of the liquid flowing from the discharge of the last compartment of the basin to the municipal sewer line and have it brought to the Quality Control (Q.C.) Lab. He(Jim Dillon) then went to Bldg. #6 to observe the situation.

In Bldg. #6 he found that liquid was still flowing out the broken nozzle on H-600 and Mr. Armella was washing it into the drainage trench with a fire hose. Jim Dillon told Mr. Armella to take a quart sample of the

VIII. (continued)

discharge from H-600 and have an operator bring it into Q.C. Lab. He (Jim Dillon) then went up to the 2nd floor and checked the volume in H-600: the tank was approximately 1/3 full. Since there was no way to seal off the broken nozzle and stop the flow without endangering someone, he advised Mr. Armella to continue as directed with the water wash to the drainage trench and went to the Q.C. Lab to check the above mentioned samples and focus attention on containment at the effluent basins.

At approximately 11:00 P.M. Jim Dillon started to qualitatively examine the samples. The sample of the discharge from H-600 was xylene i.e., immiscible with water; characteristic xylene odor. The sample of liquid from the flow into the municipal sewer indicated no xylene was present (i.e., one phase, completely miscible with water, no characteristic xylene odor), demonstrating that no xylene was going into the municipal sewer line.

At approximately 11:05 P.M. Jim Dillon instructed George Ghattas to take a quart sample from each of the 6 compartments in the effluent basin in order to obtain a profile of the xylene distribution in the basin. He also instructed Mr. Ghattas to continually take samples from the discharge compartment to the municipal sewer system and notify him immediately if there was any evidence of xylene, i.e., 2 phase and/or characteristic xylene odor.

At approximately 11:15 P.M. Jim Dillon went to Bldg.#6 and noticed that no more xylene was flowing out of H-600. Mr. Armella told him that the tank has just emptied. Jim Dillon advised Mr. Armella to flush the drainage trench with water until he (Jim Dillon) got back to him. Jim Dillon went back to the Lab. (Bldg. #7) and proceeded to check the samples (7) which G. Ghattas had taken from the effluent basin. Xylene was evident in samples from the first 4 compartments - there was no xylene evident in samples from the last 2 compartments nor was there any evident in the sample from the discharge to the municipal sewer line. He (Jim Dillon) then instructed Mr. Ghattas and Mr. Livingston (3rd shift supervisor - who arrived on the scene at approximately 11:15) to continue to drum off any xylene collected from the "skimmer"tank (1000 gal. capacity) and continue to monitor (sample) the 6 compartments and discharge line to the municipal sewer for xylene and notify him (J.D.) if any xylene is evident after the 4th compartment. He also instructed them to continue to flush the drains in Bldg. #6 with water and

VIII. (continued)

go back to normal water flow from the manufacturing areas to the basin. (It had been cut back earlier to decrease the flow across the basin.) He explained to them that this would maintain a high level in the effluent basin and insure against xylene entering the municipal sewer line since flow from each compartment to the next, comes from outlets near the bottom of the compartments and this would contain the xylene in the basin until it was all "skimmed" into the storage tank and drummed.

At approximately 11:30 P.M. a total of \approx 600 of wet xylene had been drummed off from the Holding Tank. Samples from the 5th and 6th compartments and discharge to the municipal sewer line still indicated no xylene was present. At approximately 11:45 a total of ≈ 1200 gal. of wet xylene had been drummed off and there was no change in the samples from the 5th and 6th compartments or the discharge line to the municipal sewer, i.e., no xylene was present. Monitoring of the 5th and 6th compartments and the discharge line continued until approximately 1:45 A.M. 3/13/91 with no xylene evident past the 4th compartment. A total of ≈ 1700 gal. of wet xylene was drummed off at this time. Intermittent samples were also taken from the first 4 compartments over this period to monitor the removal of xylene. There was no xylene present in any of the compartments at 2:00 A.M., the contents of the basin had returned to normal, and a total of 21750 gal. of xylenc had been separated and drummed off. At approximately 8:30 A.M. an additional 350 gals. of wet xylene was drummed off from the skimmer tank for a total of 2100 gals. of wet xylene containing approximately 600 gals. of water.

IX. Item VIII above describes the measures taken to eliminate the problem caused by the discharge. On 3/23/91 an "In Plant Forklift Truck Operator Training Program" (scheduled prior to this incident) was conducted by a representative of the NJ State Safety Council. Fifteen (15) Arsynco employees were in attendance, including the operator of the truck causing the incident. The incident was reviewed and discussed in conjunction with other safety procedures presented at the session.

JAMES P. DILLON

V.P./ENVIRON. & REG. AFFAIRS MANAGER



P. O. Box 8 • Caristadt, N. J. 07072 201-933-2323

April 3rd, 1991

Stanley J. Delikat NJ Department of Environmental Protection Bureau of Emergency Response CN 027 Trenton, New Jersey 0862-0027

> RE: Program ID#91-03-13-1519

Dear Mr. Deliket:

Enclosed is a check for \$191.83 in payment for administrative cost incurred by the Department of Environmental Protection when the Bureau of Emergency Response responded to an alleged Xylene spill at the Λ rsynco Inc. facility on March 13th, 1991.

Payment of this amount shall not be deemed as an admission that Arsynco Inc. is liable for any civil or administrative penalties and/or additional cost incurred by the Department or any other responsibilities or obligations including responsibility for any alleged damages since a reportable discharge did not occur within the premises of the Arsynco Inc. facility.

If you have any questions or require any further information please contact me at Arsynco Inc. (201) 933-2323.

Very truly yours,

VJAMES P. DILLON

V.P./REGULATORY AFFAIRS

ND

cc: D.S., W.B., P.H., J.S.



P. O. Box 8 • Carlstadt, N J. 07072 201-933-2323

June 27th, 1991

Edward Sturm, Lieutenant Hazardous Materials Unit County of Bergen Police Department 327 Ridgewood Avenue Paramus, New Jersey 07652

RE: Case No. 91-03131519-18 & Case No. 91 03211314-44

Dear Mr. Sturm:

Enclosed are checks for \$600.00 and \$450.00 in payment for the cost incurred by the Bergen County Police Department when the Hazardous Material Unit responded to the incidents that occurred on March 13th, 1991 and March 21st, 1991 at the Arsynco Inc. Facility in Carlstadt, New Jersey. Payment of this amount as stated in your invoices is not an admission of guilt by Arsynco Inc.

In addition, payment of this amount shall not be deemed as an admission that Arsynco Inc. is liable for any civil or administrative penalties and/or additional cost incurred by the Bergen County Police Department or any other responsibilities or obligations including responsibility for any alledged damages.

If you have any questions or require any further information please contact me at Arsynco Inc. 201-933-2323.

Very truly yours,

James P. Dillon

Venus Pallle

V.P./Environmental & Regulatory
Affairs Manager

ND

cc: D.Space

W. Bennett

T. Steinberg

P. Herzberg

J. Sorge



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

May 1st, 1991

New Jersey Department of Environmental Protection Division of Waste Management Metro Region No. 2 Babcock Place West Orange, New Jersey 07052

Gentlemen:

RE: Case No. 91-4-20-1219-06
Written report of Incident

7:26-9.7 (2)9 - Contingency Plan and Emergency Procedures

- I. Arsynco, Inc.
 Foot of 13th Street
 Carlstadt, New Jersey 07072
- II. Same as above
- III. Saturday, April 20th, 1991 at approximately 11:15 A.M.-Solvent Fire.
 - IV. Materials involved:

Toluene - approximately 6200 gal Methanol - approximately 5700 gal.

- V. Two people were injured:
 One received 1st to 3rd degree burns on approximately
 10% of his body and was hospitalized at Hackensack Medical Center. The other injured his left knee. He was
 treated at Hackensack Medical Center and released approximately 2 hours after the incident. He was back at work
 on 4/23/91.
- VI. Actual and potential hazards to human health were serious to those immediately in the vicinity of the fire. (Three people were in the area when the fire started) Potential Hazards to the environment also existed but were eliminated when the fire was quickly extinguished by in house personnel prior to arrival of the Carlstadt Fire Department. Upon arrival the Carlstadt Fire Department secured the area and permitted re-entry to the area at approximately 12:30 P.M.

NJ DEPT. OF ENVIR. PROTECTION (Contingency Plan continued)

- VII. The fire was confined to the south east corner of the Tank Farm, i.e., the Toluene and Methanol storage tanks, other tanks in this area were recently installed and empty at the time.
- VIII. The dyked area around the tanks were immediately checked for spills. None were found. Both tanks were immediately checked for leaks. None were found. There was no release of any material from the tanks. The incident therefore did not result in material to recover.
 - IX. The tanks in the immediate area experienced smoke and fire damage and are currently under repair.
 i.e., painting and relabeling as per State and Federal Regulations.

Very truly yours,

ARSYNCO, INC.

//JAMES P. DILLON

V.P./ENVIRONMENTAL & REGULATORY AFFAIRS MANAGER

JPD/nd cc: D.S. A.B.

W.B.

- GUESTION # 40



P.O Box 8 • Carlstadt, N.J. 07072 201 • 933 • 2323

September 27th, 1991

New Jersey Department of Environmental Protection Division of Waste Management Metro Region No. 2 Babcock Place West Orange, New Jersey 07052

RE: Case No. 91-16-1626-48
Written report of Incident

Gentlemen:

7:26 - 9.7 (2) 9 - Contingency Plan and Emergency Procedures

- I. Arsynco, Inc.
 Foot of 13th Street
 Carlstadt, New Jersey 07072
- II. Same as above
- III. Monday September 16th, 1991 at approximately 4:00 P.M.Solvent Fire. Safety device (rupture disc) on reactor was activated emitting Isopropyl alcohol and Hydrogen which spontaneouly ignited at the roof vent.
 - IV. Materials involved:

Isopropyl alcohol - approximately 1 lb.
Hydrogen - approximately 1 lb.

- V. No one was injured
- VI. Actural and potential hazards to human health were serious to those immediately in the vicinity of the fire. (One person was in the area when the fire started). Potential Hazards to the environment were minimal and were eliminated when the fire was quickly extinguished by in house personnel prior to arrival of the Carlstadt Fire Department. Upon arrival the Carlstadt Fire Department secured the area and permitted re-entry to the area at approximately 4:25 P.M.

- VII. The fire was confined to the South east side of the roof area of Bldg. #8 (approximately 16 feet 2)
- VIII. The area was inspected by the Carlstadt Fire Department to insure that the fire was completely extinguished and checked for combustibles in conjunction with the plant Safety Director. None were present. Contents released from the reactor were consumed in the fire resulting in no material to recover.
- IX. An assessment is being conducted by Arsynco Inc. Engineering Department to determine the feasibility of installing a catch ("burp") tank equipped with an inert gas (Nitrogen) blanketing system to contain any emissions and prevent a fire should a rupture disc be activated.

If you have any questions or require more information regarding this incident please contact me at Arsynco Inc. (201) 933-2323 Ex. 237

Very truly yours,

James P. Dillon

VP/Req. Affairs Mgr.

ND

cc: D.S.,W.B., J.F., H.O.



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

October 25th, 1991

New Jersey Department of Environmental Protection & Energy Division of Waste Management Metro Region No. 2 Babcock Place West Orange, New Jersey 07052

> RE: Case No. 91-10-9-1847-24 Written Report of Incident

Gentlemen:

7:26 - 9.7 (2) 9 - Contingency Plan and Emergancy Procedures

- I. Arsynco, Inc. Foot of 13th Street Carlstadt, New Jersey 07072
- II. Same as above
- III. Wednesday, October 9th, 1991 at approximately 6:20 P.M. Vapor and particulate emission Safety device (rupture disc) on reactor in Bldg. #1 was activated emitting predominantly steam and a cosmetic hair dye. The material discharged was subsequently analyzed by a NJDEPE certified lab (Laboratory Resources Inc. located in Westwood, New Jersey) and deemed non toxic by representatives of the NJDEPE. In addition the pressure relief system was overwhelmed and glass piping along with other parts of the reactor failed, causing a release of the same materials to the immediate area.

IV. MATERIALS INVOLVED**

- 1. Water-Approximately 3000 gal.
- Cosmetic Hair Dye -trade name P-132
 Chemical name 2-nitro-N(2-Hydroxyethyl)-aniline
 Cas No. 4926-55-0
 Quantity 1270 lbs
- 3. Mono Ethanol Amine Hydrochloride Cas No. 2002-24-6 Quantity 675 lbs
- 4. Mono Ethanol Amine Cas No. 141-43-5 Quantity 427 lbs

- 5. Potassium Fluoride Cas No. 7789-23-3 Quantity 427 lbs
- 6. O-Nitro Chloro Benzene
 Cas No. 88-73-3
 Quantity 5ppm ± 5ppm based on certified Lab data on samples taken under direction of the NJDEPE.
 - **Except for water, the material involved and quantities are based on the reaction going to completion. This was confirmed by testing samples taken under the direction of the NJDEPE at a certified analytical laboratory. The above does not refer to materials emitted. The emission consisted of predominently water vapor (steam) and the hair dye and was deemed to be non toxic by the NJDEPE. The absolute quantities of these materials are indeterminate due to the nature of the emission.
- V. Five (5) Arsynco Inc. employees were taken to Hackensack General Hospital for observation and released. None were injured severely or experienced exposure that warranted overnight observation. (One employee, the boiler operator, who was not in the building where the release took place was treated for a possible injury due to a fall during the evacuation.) Six (6) emergency responders were also taken to Hackensack Hospital for observation and were released along with the Arsynco employees.
- VI. Because the pressure relief system was overwhelmed and parts of the reactor failed, actual and potential hazards to human health were serious to those in the immediate vicinity of the reactor. Previous training of the operators involving Health, Safety and Emergency Procedures along with explicite operating instructions and provisions for a temperature excursion prevented serious injury.

Actual hazards to the environment were not serious since certified testing of samples from the surrounding area were deemed to be non toxic by the NJDEPE. Potential Hazard to the environment would have been serious had the materials been toxic.

VII. The emission was carried by the wind in a north easterly direction (40°) at approximately 6 mph, across Rte 17 and over part of Carlstadt, Woodridge and to a lesser degree Hasbrouck Heights and Lodi. These areas are densely populated and a number of residents experienced fallout of the hair dye on their homes, automobiles and other property. Since the emission occurred during the evening rush hours vehicles traveling on Rte 17 and adjacent roadways were also exposed to the fallout.

The local emergency responders (Fire Dept etc.) and the NJDEPE were VIII. notified immediately and emergency evacuation procedures were initiated as per Arsynco Inc. Emergency Response Plan. The Carlstadt Fire Department arrived on the scene at G:30 P.M. 10/9/91. Other emergency responders including local ambulance squads, Bergen County HAZMAT and the NJDEPE arrived a short time later. Building #1 was quarantined by the emergency responders until approximately 4:00 P.M. 10/10/91. In the interim samples were taken under the supervision of the NJDEPE throughout the areas of heaviest exposure and evaluated for toxicity. Qualitative testing performed by Arsynco Inc. personnel between the 9:30 P.M. and 12:00 A.M. on 10/9/91 indicated that the emission was non toxic. Subsequent quantitative analysis performed by a NJDEPE certified lab (Laboratory Resources Inc.) confirmed these findings and the NJDEPE deemed the emission non toxic at approximately 4:00 P.M. on 10/10/91.

Arsynco Inc. personnel secured the area the evening of 10/10/91. On 10/11/91 the area was inspected by the Carlstadt Fire Department, OSHA and E.P.A. investigators. After the inspection Arsynco Inc. personnel resecured the area and contacted a certified outside contractor for clean up. On 10/18/91 the clean up was complete and the area was cleared for entry. There were no materials recovered from the incident.

IX. Arsynco Inc. hazardous Analysis Team, immediately reassessed the process procedure and declared it could no longer be used to manufacture this product. Instead a previously proven safe procedure, although less economically efficient, (cycle time 120 hrs) would be reinstituted.

In addition Arsynco Inc. is consulting with an outside research group that specializes in determining possible causes for an incident of this nature. Internal hazardous analysis methods and procedures are also under review an will be modified accordingly.

If you have any questions or require more information regarding this incident please contact me at Arsynco, Inc. (201) 933-2323 Ext. 237.

Very truly yours,

James P. Dillon

James Lell

VP/Envir. & Reg. Affairs Mgr

ND

cc: D.S., W.B., L.C., J.F., H.O., M. Wagshul NJDEPE

Emil-



P.O Box 8 • Carlstadt, N.J. 07072 201 - 933 - 2323

May 21, 1992

New Jersey Department of Enivronmental Protection & Energy Division of Waste Management Metro Region 2 Babcock Place West Orange, NJ 07052

> Re: Case No. 92-5-8-0916-47 Written Report Of Incident

Gentlemen:

7:26-0 (2) 9 - Contingency Plan and Emergency Procedures

- I. Arsynco, Inc. Foot of 13th Street Carlstadt, NJ 07072 201-933-2323
- II. Same as above
- III. Friday, May 8, 1992 at approximately 9:00 AM (0900) Non-Emergency Release.
- IV. 40% Mono-Methylamine approximately 5 gallons
- V. There were no injuries.
- VI. There was no actual or potential hazard to human health or the environment. Procedures specified in Arsynco's Summary Risk Management Program (TCPA) and Spill Prevention Plan were immediately implemented and effectively prevented any harm to personnel or the environment.
- VII. The 0.5 gallon of the release was confined to an approximate two square foot of macadam paved roadway. The balance (approximately 4.5 gallons) was collected in pails and consolidated into a drum.
- VIII. The entire release was immediately acidified with diluted acetic acid (5%) and rendered harmless. Approximately 50 gallons of recovered acidified solution was consolidated into a drum for recycle to the appropriate process stream.

IX. Implementation schedule to eliminate the problem - not required, situation was taken care of immediately.

Arsynco, Inc. was not involved in the cause of this incident. A faulty (leaking) mechanical seal on a tank wagon transfer pump during delivery of 40% Mono Methylamine by Montgomery Tank Lines Inc. caused the release.

If you have any questions or require additional information regarding this incident, please contact me at 201-933-2323, Ext. 237.

Very truly yours,

Vames P. Dillon

VP/Environmental and Reg.

Affairs Manager

JPD/1t

cc: DS, JF, EI, WB, A. Schiff (DEPE)



P.O. Box 8 • Carlstadt, N.J. 07072 201-933-2323

July 10th, 1992

New Jersey Department of Environmental Protection & Energy Division of Waste Management Metro Region 2 Babcock Place West Orange, NJ 07052

> RE: Case No. 92-6-27-1031-21 Written Report of Incident

Gentlemen:

7:26-0 (2) 9 - Contingency Plan and Emergency Procedures

- I. Arsynco, Inc. Foot of 13th Street Carlstadt, NJ 07072 201-933-2323
- II. Same as above
- III. Saturday, June 27th, 1992 at approximately 10:10 AM (1010) Non-Emergency Release.
- IV. Mineral Oil approximately 25 gallons
 - V. There were no injuries.
- VI. There was no actual or potential hazard to human health or the environment. Procedures specified in Arsynco's Spill Prevention Plan were immediately implemented and effectively prevented any harm to personnel or the environment.
- VII. The 25 gallons of the release was confined to an approximate 5 square foot area well within the plant site.
- VIII. The entire release was immediately contained and collected in a drum for recycle to the appropriate process stream.
 - IX. Implementation schedule to eliminate the problem not required. The incident was taken care of immediately.

If you have any questions or require additional information regarding this incident, please contact me at 201-933-2323, ext. 237.

Very truly yours,

James P. Dillon

VP/Environmental & Reg. Affs Mgr.

ND

cc: D.S.,J.Fr.,J.L.,J.Fe. E. I., A. Schiff(DEPE)



P.O. Box 8 • Carlstadt, N. J. 07072 201-933-2323

November 4th, 1992

Mr. Bruce Doyle
Investigator
New Jersey Department Environmental
Protection and Energy
Division of Environmental Quality
Bureau of Emergency Response

RE: Case No. 92-10-14-0939-48
Field Notice of Violation
dated 10/14/92
Written account of incident
and corrective measures taken
to attain compliance.

Dear Mr. Doyle:

On Wednesday, October 14th, 1992 at approximately 0700 there was an accidental discharge of approximately 50 gals of Xylene onto the ground and into a tidal ditch located adjacent to bldg. #19 at the Arsynco, Inc., Carlstadt Facility.

There were no injuries. Because of the ongoing containment measures in place - The area is part of our Voluntary Cleanup Program/MOA with the DEPE - and immediate implementation of Arsynco Inc. Spill Prevention Plan any potential hazard to human health or the environment was immediately remediated.

When the release occurred the shift Emergency Coordinator directed all efforts to contain and remediate the problem. In the excitement and stress of the moment, emergency notification procedures broke down and neither the Shift Emergency Coordinator or the Assistant Coordinator notified the DEPE hot line. The shift change at 0730-0800 compounded the breakdown and it was not until approximately 9:30 AM that it became evident the DEPE had not been notified. The Environmental Department of Arsynco, Inc. then immediately notified the DEPE at approximately 0940.

To insure that this does not occur again, all of Arsynco's Inc. Emergency Coordinators and their Assistants have been reminded in writing of their responsibilities to notify the DEPE - within 15 minutes - whenever a spill or release occurs. Additional Training and Drills will be scheduled in November '92 and December '92 to insure that the Emergency Procedures at Arsynco are clearly understood and carried out properly should any spill or release occur in the future.

If you have any questions or require more information regarding this incident, please contact me at Arsynco, Inc. (201) 933-2323 Ext. 270.

Very truly yours,

pames p. Della

James P. Dillon

V.P./Regulatory Affairs Mgr.

ND

cc: D. Space

A. Schiff, DEPE



November 12, 1992

Bureau of Discharge Prevention
New Jersey Department of Environmental Protection and Energy
401 East State Street
CN 027

Trenton, N. J. 08625-0027

Attention: Discharge Confirmation Report

Re: Case No. 92-10-14-0939-48

Plant ID: 00098

Dear Sirs.

On Wednesday, October 14, 1992 at approximately 0700 hours there was an accidental discharge of about 50 gallons of xylene onto the ground and into a tidal ditch located adjacent to Building No. 19 at the Arsynco, Inc. facility. There were no injuries. The incident was reported to NJ DEPE by phone at about 0940 hours and was given the reference Case Number. This letter is the Confirmation Report required by NJAC 7:1E-5.8.

Per NJAC 7:1E-5.8(b):

1. The name, address and telephone number of the individual that reported the discharge is as follows:

Jack B. Feder 66 Teak Rd. Dumont, N. J. 07628 (201)-384-1218

2. The name, address and telephone number of the individual submitting the Confirmation Report is as follows:

Dennis V. Space 28 Cambridge Drive Annandale, N. J. 08801 (908)-730-9562

3. ...the name, address and telephone number of the person subject to the provisions of 7:1E-5 for whom the Confirmation Report is being submitted:

Not applicable

Page 2
Bureau of Discharge Prevention, NJ DEPE

4. The name, address and telephone number of each person in any way responsible for the discharge is as follows:

Feroz Khan (Operator) 132-59 Metropolitan Ave. Queens, N.Y. 11418 (718)-739-1353

Timothy McDermott (Shift Foreman) 637 Woodland Ave. Lawrance Harbor, N.J. Ø8879 (908)-290-9143

Richard Nathanson (Production Manager) 89-14 Bedell Lane Brooklyn, N.Y. 11236 (718)-763-5823

5. The name, address and telephone number of each owner and operator of the facility at which discharge occurred is as follows:

Arsynco, Inc. is a wholly owned subsidiary of Aceto Corp.

1 Hollow Lane
Lake Success, N.Y. 11042-1215

(516)-627-6000

- 6. The source of the discharge was the outdoor vent line of an indoor 1,000 gallon glass lined storage vessel, TS-267.

 (The vessel was overfilled.)
- 7. The location of the discharge was:

 i. From Building No. 19 at Arsynco, Inc., Foot of 13th
 Street, Carlstadt, N. J. Ø7072, Tax Lot 1, Block 91. The
 facility is located in Bergen County. The NJ DEPE Plant ID.
 is Ø0098. A map of the plant site showing the area in which
 the discharge occurred and the surrounding area is enclosed.
 - ii. The discharge drained from the land beneath the vent pipe into a "mosquito" ditch located a few feet away. This ditch drains into Never Touch Creek, about 1/4 mile away from the discharge site. Never Touch Creek in turn joins Berry Creek. The discharge location is at $40_{\circ}50'7$ " North Latitude and $74^{\circ}5'$ West Longitude. A map identifying the areas affected by the discharge is enclosed.
- 8. The common name of the hazardous substance discharged is XYLENE (MIXED) and its CAS number is 1330-20-7.
- 9. A "best estimate" of the quantity discharged is 50 gallons.

Page 3 Bureau of Discharge Prevention, NJ DEPE

- 10. The date and time the discharge began: 10/14/92 @ 0700 hours. The date and time the discharge was discovered: 10/14/92 @ 0701 hours.
 - The date and time the discharge was ended: 10/14/92 @ 0702 hours.
 - The date and time the DEPE was notified: 10/14/92 @ 0940 hours.
- 11. Measures taken to contain, clean up and remove the discharge:
 - A. Floating separators made of absorbent within long canvas bags ("pigs") are normally kept in place across four parts of the mosquito ditch, forming barriers which force the water to flow beneath them, thus containing any floating solvents (such as xylene) which might inadvertently come into the water. After the discharge, additional pigs were deployed to contain most of the xylene reaching the ditch, keeping it from flowing into the creek.
 - B. Granular adsorbent (Sorb-All) was shoveled onto the land area beneath the vent discharge point and also along the downgrade to the mosquito ditch. This material will be packaged and disposed of in conjunction with our Voluntary Compliance Program. The Memorandum of Agreement for this is administered by Mr. Arnold Schiff, DEPE Bureau of Field Operations, West Orange, N.J.
 - C. A submersible centrifugal pump was then placed into each of the "compartments" formed by the berms. This pump was used to remove floating xylene from the compartments, along with some water and xylene contaminated muck, and send it to our waste water treatment facility. There, surface "vacuums" and oil mops remove floating solvents from the water and bring it to a storage container from which it is disposed of as a hazardous waste. This method of handling is a part of the Contingency Plan for the Arsynco plant.
 - D. An on-site test for flammability, viewed by a representative of NJ Dept. of Health's HAZMAT team, was done of the soil beneath the TS-267 vent pipe discharge. No evidence of flammibility was found.
 - E.. Costs for Items A and C are nominal. Costs for disposing of the spent granular absorbent are not yet known.
- 12. Corrective actions or countermeasures taken or proposed to minimize the possibility of recurrence include:
- A. The discharge end of vessel TS-267's vent line has been relocated so that, should overflow ever inadvertently occur in future, the xylene would flow onto a concrete pad

separated from the bare ground by a concrete curbing.

- B. The sight glass on vessel TS-267 has been replaced with a type more easily read. (Operator difficulty in seeing where the level was is believed to have contributed to the overfilling of the vessel.)
- C. The piping around vessel TS-267's sight glass was modified to allow removal of any solid particulates that might block the sight glass and prevent it from showing a true reading.
- 13. Additional operator training will be undertaken so as to minimize the possibility of recurrence.
- 14. Arsynco, Inc. has, thus far, been the only entity directly involved in the containment, cleanup or removal of the discharge. Inspection of the containment and cleanup was made by Mr.Bruce F. Doyle, NJ DEPE Bureau of Emergency Response, West Orange, H.J., as well as by representatives of NJ Dept. of Health (HAZMAT) and the Bergen County Police.
- 15. At this time, no samples have been taken. Such samplings might occur in future as a part of our Voluntary Compliance Program. The Memorandum of Agreement for this is administered by Mr. Arnold Schiff, DEPE Bureau of Field Operations, West Orange, N.J.
- 16. No results of samplings are available, since no samples have as yet been taken (per Item 15).
- 17. Arsynco, Inc. hereby states that it can meet its financial responsibility for taking corrective action for this discharge.
- 18. No supplemental information is available.
- 19. If able, we will provide DEPE with requested information.
- 20. A fully executed certification persuant to NJAC 71:4.11 is attached.

cc: J. Dillon

- B. Doyle, DEPE Bur Emerg Resp
- J. Feder
- P. Herzberg, Counsel
- E. Ippolito
- H. Olenberg
- A. Schiff, DEPE Bur Field Ops

Veny truly yours,

Dennis V. Space

President and General Manager



CERTIFICATION OF DENNIS V. SPACE

- I, Dennis V. Space, do hereby certify that:
- 1. I am President of Arsynco Incorporated ("Arsynco") at Arsynco's facility located at the Foot of 13th Street, Carlstadt, NJ 07072, (201) 933-2323 ("the Facility"). As such, I make this Certification in support of Arsynco's claim, pursuant to N.J.S.A. 7:1E-5.6 that it notified the NJ DCPE as immediately as reasonably possible regarding a discharge of approximately 50 gallons of Xylene at the Facility on October 14, 1992.
- 2. The discharge began at approximately 7:00 AM on October 14, 1992. and was immediately halted and remediation efforts immediately began by Timothy McDermott, a Production Supervisor for Arsynco at the Facility.
- 3. In the excitement and stress of the moment and due to the immediate and ongoing remediation efforts, Arsynco personnel did not notify NJ DEPE until approximately 9:40 AM, at which time Arsynco's Environmental Department called the NJ DEPE Hotline.
- 4. Because the Arsynco personnel who discovered the discharge were involved in immediate and ongoing remediation efforts, initiation of the notification procedures within 15 minutes would have been unreasonable.

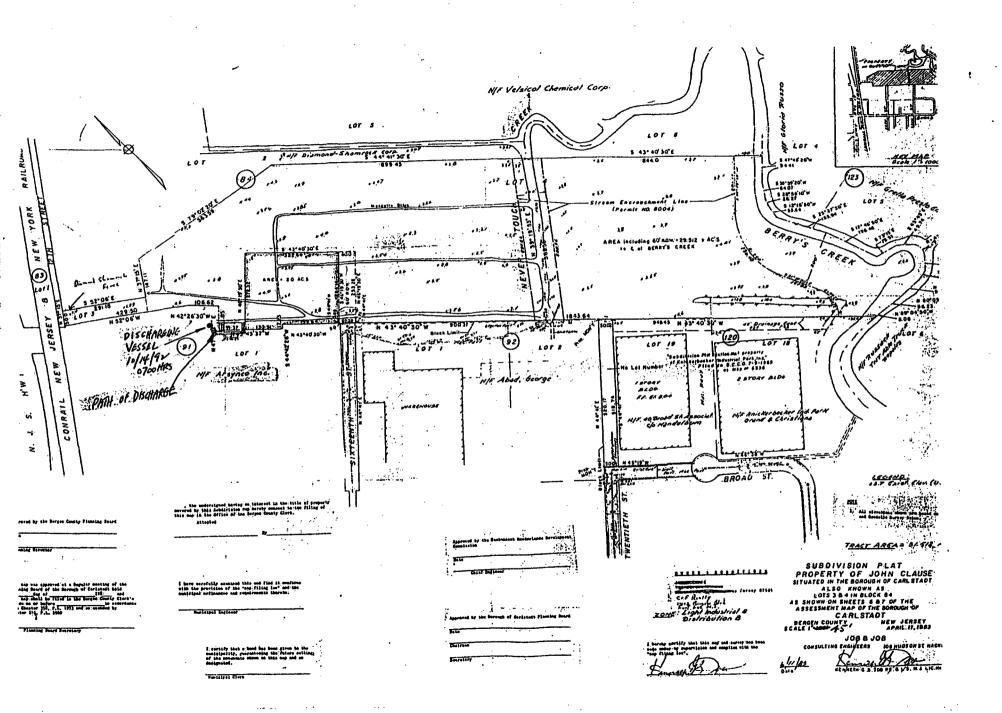
I certify that the foregoing statements made by me are true.

I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DENNIS V. SPACE

Resoll Spra

:: • ...



ATTACHMENT K

ECRA FORM 002A
"REQUEST FOR HYDROGEOLOGIC ASSESSMENT"
(ITEM 11. B. OF SES)

Apper	rdix	=	
whha	шх	=	

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF WATER RESOURCES

NEW JERSEY GEOLOGICAL SURVEY

REQUEST FOR HYDROGEOLOGIC ASSESSMENT — ECRA PROGRAM

(To be completed whenever groundwater sampling is proposed or required as part of a Sampling Plan)

Preparer J M Sorge, Inc.	Date March 8, 1993
Name of Industrial Establishment Arsynco, Inc.	
Address 13th Street	
City/Township Carlstadt C	County <u>Bergen</u>
USGS Quadrangie <u>Weehawken</u>	
Latitude 40° 50' 08" Longitude	74° 04 58 "
 Attach a site map or photo copy of the USGS "Quad" with the location any relevant information (e.g. analyses, well logs, etc.) 	n of the site circled or outline in RED an
2. A. Are wells nearby? X Yes No	
B. Are wells contaminated? <u>x</u> Yes No	
C. To your knowledge, is there an imminent health hazard?	Yes <u>x</u> No
D. Mark the location of any known wells near the facility, and com- available. (Use back of sheet for additional remarks.)	plete the following if such information
Distance from Edge of Well Owner Property (ft.)	Depth Use* Remarks
1. A complete well search is being conducted, and	the results will be
2. forwarded to the Department under separate cover	<u>er</u>
3.	
4.	
5.	
* P = Public Supply F = Irrigation l = Industrial M = Monito	oring D = Domestic
3. Briefly describe the nature of the operation (present/past) at this facility	•
Present and past operations conducted at this si	
of specialty organic chemicals and pharmaceutical	,

4.	Check known or suspected sources of ground water or soil contamination:				
	X Drums X Spill(s) Lagoon(s) Septic Tank(s) Seepage Pit(s) Below-ground Storage X Above-ground Storage Landfill(s) Industrial Accident X Discharge(s) onto Ground X Other - Explain Below				
5.	Additional Comments				
	- Virtually the entire site has been filled in with generally poor				
	quality fill material.				
	- Numerous contaminated sites (soil and groundwater) are located in				
	the immediate vicinity of the Arsynco site.				

ATTACHMENT L

HISTORICAL DATA ON ENVIRONMENTAL QUALITY (ITEM 13. A. OF SES)

ENVIRONMENTAL ASSESSMENT REPORT

ARSYNCO, INC. Carlstadt, NJ

Building 19 Area

Prepared for

ARSYNCO, INC. Carlstadt, Bergen County,

Prepared by

J M Sorge, Inc. 50 County Line Road Somerville, NJ 08876

JMS Project #91055

October 1991

TABLE OF CONTENTS

			Page
1.0	INTR	ODUCTION	1
	1.1	SITE BACKGROUND	1
2.0	ENVI	RONMENTAL SETTING	2
		GENERAL	2
		SOILS	2
	2.3	SITE SPECIFIC SURFACE DRAINAGE/TOPOGRAPHY	3
		REGIONAL GEOLOGY/HYDROGEOLOGY	3
	2.5	SITE SPECIFIC GEOLOGY/HYDROGEOLOGY	4
3.0	SOIL	SAMPLING PROGRAM	4
	3.1	DELINEATION BORING ACTIVITY	4
	3.2	SOIL SAMPLING RESULTS	5
4.0	GROU	NDWATER INVESTIGATION PROGRAM	6
	4.1	MONITORING WELL INSTALLATION	6
	4.2	WELL BORINGS	6
	4.3	MONITORING WELL CONSTRUCTION	7
	4.4	WELL DEVELOPMENT/SURVEY	7
	4.5	GROUNDWATER SAMPLING	7
		4.5.1 Groundwater Sampling Results	8
	4.6	PRELIMINARY AQUIFER TESTING PROGRAM	8
		4.6.1 Slug Tests Results	8
		4.6.2 Groundwater Flow Analysis	9
5.0	QUAL	ITY ASSURANCE/QUALITY CONTROL	10
	5.1	SOIL AND GROUNDWATER SAMPLING PROCEDURES	10
	5.2	LABORATORY ANALYSES	11
6.0	CONCLUSIONS		11
		SOILS RESULTS	11
		GROUNDWATER RESULTS	13
	6.3	FURTHER INVESTIGATIONS	14

LIST OF TABLES

Number	Title			
1	Delineation Boring/Sampling Results Summary			
2	Groundwater Sampling Results Summary			
3a	Tide-Induced Groundwater Fluctuations Data Summary (MW-1)			
3b	Tide-Induced Groundwater Fluctuations Data Summary (MW-2)			
3 c	Tide-Induced Groundwater Fluctuations Data Summary (MW-3)			
3 d	Tide-Induced Groundwater Fluctuations Data Summary (MW-4)			
	LIST OF FIGURES			
	LIST OF FIGURES			
1	Site Location Map			
1.1	Site Map			
2	Map Showing Area of Concern			
3	Sample Location Map			
4	Volatile Organic Contaminant Isopleth Map			
5	Groundwater Elevation Contour Map (8/1/91)			
6	Groundwater Elevation Contour Map (8/20/91)			
7	Diagrammatic Illustration of Tidal-Induced Groundwater Fluctuations			

LIST OF APPENDICES

Number	Title
A	Summary of Suspected/Known Hazardous Waste Sites
B	JMS Standard Field Sampling Procedures
C	Detailed Laboratory Results
D	Soil Boring and Well Borehole Logs and Well Construction Diagram
E	NJDEP Well Permits
F	Well Certifications
G ੈ	Slug Test Raw Data/Calculation
н	Groundwater Flow Analysis Data

ARSYNCO, INC. Carlstadt, New Jersey

ENVIRONMENTAL ASSESSMENT REPORT

1.0 INTRODUCTION

J M Sorge, Inc. (JMS) was retained by Arsynco, Inc. to conduct a Site Assessment program in the area of Building #19 at their Carlstadt Plant. The Arsynco, Inc. - Carlstadt facility, is located at the Foot of 13th Street, Carlstadt, Bergen County, New Jersey (Figure 1). The Site Assessment program included soil sampling and a preliminary groundwater investigation. The results of the soil sampling program and groundwater investigation are respectively discussed in Sections 3.0 and 4.0 of this report.

1.1 SITE BACKGROUND

The Arsynco, Inc. Carlstadt Plant consists of several manufacturing/storage buildings situated on approximately 12.3 acre parcel (Figure 1.1). The property was acquired by Arsynco sometime in 1969, and has been used for the manufacturing of raw material for the pharmaceutical industries. According to the information obtained from the Plant Consultant, Mr. Wesley Bennett, the plant has been in existence since about 1907. The primary operation at the facility has been the batch production of specialty chemicals.

Building #19, the area of concern, was constructed sometime in the mid-1960s. The building is used for the manufacture of Propylene Imine. The basic raw materials utilized in the manufacturing process are isopropanol amine, sulfuric acid, xylene, sodium acetate solution, and sodium hydroxide. These compounds are reacted in the process to form Propylene Imine. Xylene is non-reactive and is used only to keep the precipitate of isopropanol amine sulfate in solution during the manufacturing process.

An enclosed tank farm is located adjacent to the southeast wall of Building #19. These above ground tanks are used for the storage of sodium hydroxide solution, sulfuric acid, toluene and isopropanol amine. A material staging area is located approximately 40 feet to the south and southeast of the tank farm (Figure 2).

A swale is located along the northern part of this area; the soil near this swale was sampled by the New Jersey Department Environmental Protection (NJDEP) in April 1991. The sample collected by NJDEP personnel was found to contain elevated levels of xylene and other volatile contaminants. On March 21, 1991, representatives of the Department determined that the pH within a portion

Page 1

of the swale area ranged between 10 and 12. Subsequent investigations by the facility identified a crack in the containment wall which is believed to have been the source of the problem. The wall was repaired. In addition, Arsynco elected to conduct a more thorough investigation of this area. The results of the delineation borings and groundwater investigation conducted in this area are provided in Sections 3.0 and 4.0, respectively.

A cursory review of the recent issue of the NJDEP Hazardous Waste Program Status Report (1990), the USEPA's CERCLIS list and local regulatory agency's records showed that there are at least four (4) known, or suspected, hazardous waste sites within one-half radius of the Arsynco site. The known or suspected hazardous waste sites identified include Becton of East Rutherford, Scientific Chemical Processing of Carlstadt, Ventron/Velsicol of Carlstadt and Universal Oil Product Corp. of East Rutherford. A summary of the nature of their operations and type of contaminants identified in each site is provided in Appendix A. The hazardous site location map is also included in Appendix A.

2.0 ENVIRONMENTAL SETTING

2.1 GENERAL

The Arsynco Plant is located in Bergen County, New Jersey. The major land uses in the site area are industrial, commercial and residential. The nearest residential area is located approximately within one-half mile to the north (upgradient) of the site.

2.2 SOILS

The soil in the site area, according to the USDA Soil Conservation Service (Soil Survey of Bergen County, New Jersey, 1989) has been mapped as Udorthents wet substratum. Typically, this soil type consists of materials which have been smoothed or extensively disturbed to a depth of 3-feet or more. The fill material generally consists of a mixture of soil material with variable amounts of stones, boulders and rubble, and are somewhat poorly to very poorly drained. This unit is also subject to flooding or prolonged ponding.

Site specific soil information was obtained during installation of delineation soil borings and monitoring wells boreholes. According to the boring log data, the soils beneath the site consist of assorted fill material to the average depth of 5 feet. The fill materials encountered consisted mainly of fine to medium

sand with traces of silt, brick and concrete fragments. The meadowmat layer underlies the fill material and extends to the depth of approximately 9 feet below grade. A layer of grey silty, clayey sand and dense grey clay were encountered at the depth interval of 9 to 21 feet.

2.3 SITE SPECIFIC SURFACE DRAINAGE/TOPOGRAPHY

The site is located in the reclaimed portion of the grassy marsh area of the Hackensack River flood plain. The base topographic elevation of the site is approximately 4.5 feet above mean sea level (msl). Within the confines of the site, runoff from the property is directed toward the municipal storm/sanitary sewer via the effluent treatment basin. All surface drains on site discharge into the effluent treatment basin.

In addition, periodic flood water is drained from the site by a series of interconnecting ditches that run along the southeastern, southern and southwestern boundaries of the site. All ditches discharge into Berry Creek Canal, a tributary of the Hackensack River. The present site topography and drainage pattern have been significantly modified.

2.4 REGIONAL GEOLOGY/HYDROGEOLOGY

The Brunswick and Stockton Formations underlie Bergen County. The Brunswick Formation, the uppermost unit of the Newark Group, consists predominantly of interbedded brown, reddish-brown and gray shale, sandy shales, sandstones and some conglomerates. Overlying the rocks of the Newark Group are unconsolidated clay, sand, and gravel deposits of the Pleistocene and Recent Age. Pleistocene deposits are the most widespread and are found throughout the County. These glacio-fluvial unconsolidated deposits are as much as 300 feet in thickness. In areas between valleys where bedrock surfaces, it ranges between 0 to 70 feet. Regional studies conducted in the area indicate that unconsolidated deposits range to a depth of up to 50 feet in thickness in this part of the County. The deposits consist of red-brown clay with some silt and sand. Groundwater is expected at a depth of about 5 to 6 feet below grade. Rocks of the Brunswick Formation are the main source of the groundwater in Bergen County. shales and sandstones are generally capable of sustaining moderate to large yields. Wells in sandstone and shale of the Brunswick Formation yield from 35 to 870 gpm. The most productive wearing-bearing zones occur between depths of 300 to 400 feet.

2.5 SITE SPECIFIC GEOLOGY/HYDROGEOLOGY

Regional information indicates that bedrock will not be encountered at shallow depths due to the thickness of the stratified and unconsolidated glacio-fluvial sandy deposits typical of this area. Groundwater is encountered on-site at an average depth of 12.5 to 13.0 feet in the confined aquifer beneath the fill material and meadowmat overburden. Perched water is encountered within the fill overburden at 1.0 to 6.0 feet below grade.

The site is subject to tidal influences from the Hackensack River and the Newark Bay, which are located less than one-half mile to the east and south of the site, respectively. Groundwater flow beneath the site, although minimal, has a net gradient towards the adjacent Berry Creek.

Figures 5 and 6 are potentiometric maps completed from static water level measurements obtained on August 1, and 20, 1991, respectively. Please note that although groundwater flow is tidal in the site area, the net effect of the tide on actual groundwater flow is minimal. An analysis of the tidal induced component of groundwater flow is provided in Section 4.6.2. The groundwater flow analysis indicates that the net actual groundwater flow direction is toward the east and east/northeast.

3.0 SOIL SAMPLING PROGRAM

JMS conducted a soil sampling program in the area of building #19 during the period of June 21 through 26, 1991. The objective of the program was to delineate the horizontal and vertical extent of any contamination within the fill material overburden in the area. The method used by JMS conforms to current NJDEP guideline for sample quality control and analysis. Soil sampling activities were conducted in accordance with the NJDEP - Division Hazardous Waste Management (DHWM) Remedial Investigation Guide, March 1990 and the NJDEP Field Sampling Procedure Manual, February 1988. A discussion of the soil sampling activity is provided in Section 3.1; the analytical results are discussed in Section 3.2.

3.1 DELINEATION BORING ACTIVITY

A series of soil borings were installed in the areas of Building #19, the Tank Farm and Material Staging Area (Figure 3). The borings were installed in approximately 20-foot grid pattern utilizing either a trailer-mounted drill rig or a stainless steel hand auger. All borings were installed in accordance with JMS standard field procedures (Appendix B). Soil samples were collected from the depths of 1.5 to 2.0 feet and the 6-inch soil increment immediately above the meadowmat surface. Additional soil samples were collected from the 0 to 6-inch soil interval above the perched water zone. Boring logs are included in Appendix D.

A total of 60 borings were installed on the site (Figure 3). Field screening was used to aid in delineation and selection of samples for analysis. An Hnu photoionization detector (PID) was utilized in determining the approximate level of volatile organics within each boring. Samples collected were selectively analyzed for total volatile organics+15 (VO+15), base neutral+15 (BN+15) and total petroleum hydrocarbon (TPHC) based on the area of collection and field screening results. All soil samples collected were analyzed by Accutest Laboratories of Dayton, NJ. Accutest is a NJ-certified laboratory capable of conducting the required analysis. The results of the delineation borings are discussed in Section 3.2, a summary of the analytical results is provided in Table 1.

3.2 SOIL SAMPLING RESULTS

The results of the soil investigation confirm the presence of volatile organic (VO) materials within the industrial fill material at various points across the area investigated. The elevated VO concentrations appear to be concentrated within the immediate vicinity of Building #19, the tank farm and the material staging area. Volatile organics were detected in all samples collected at concentrations varying from .024 to 14,200 parts per million (ppm). The highest levels of VOs detected were obtained from borings ARSD-33, ARSD-36, ARSD-41 and ARSD-53.

These borings, except for ARSD-53, are located along, and within 2-feet of, the northern, eastern and southern walls of Building #19. ARSD-53 is located approximately 40 feet to the southwest of Building #19 (Figure 3).

The major VO parameters identified in all samples analyzed were xylene, ethylbenzene/benzene and toluene. Trace levels of methylene chloride, chloroform and trichlorofluoromethane were also detected. In addition, a slightly elevated PHC level was detected in most of the borings, with the highest concentration (1600 ppm) being detected in ARSD-36 and ARSD-55. Trace levels of base neutrals (BN) were also detected in selected samples ranged from 1.3 ppm to 7.7 ppm. Detailed laboratory results are included in Appendix C. These BN levels are well below current State action levels.

During the soil sampling activity, an Hnu PID was used in determining the approximate level of the aromatic compounds in each boring. The data obtained were used to plot a contaminant isopleth map (Figure 4). As indicated on the map, two (2) separate areas of elevated readings (hotspots) exist. One is located between Building #19 and the tank area, and the other is within the drum storage area. This pattern is relatively consistent with the laboratory analytical data obtained for this area.

4.0 GROUNDWATER INVESTIGATION PROGRAM

A groundwater investigation program was implemented by JMS to characterize the nature and extent of any groundwater contamination in the area of Building #19. The objective of this investigation was to evaluate the environmental quality of the groundwater within the perched zone above the meadowmat, and within the first true groundwater beneath the meadowmat layer. In addition, the groundwater flow direction was also evaluated. Four (4) monitoring wells (MW-1 through MW-4) were installed during this phase of groundwater investigation.

4.1 MONITORING WELL INSTALLATION

A total of four (4) monitoring wells were installed on-site during the period of July 15 through 17, 1991. The wells were installed by Milltown Drilling & Excavation, Inc. (MDE) of Somerville, NJ with the direct supervision of a NJ-licensed well driller and JMS hydrogeologist. A NJDEP well permit was obtained for each well prior to drilling and installation. Copies of well permits are provided in Appendix E.

The locations of the wells are illustrated on Figures 5 and 6. Monitoring wells MW-1 through MW-3 were installed in a triangular pattern around Building #19 and the adjoining tank farm. The wells were installed in the native soils beneath fill material and meadowmat overburden and were designed to assess the impact of the facility operation on groundwater beneath the site. Monitoring well MW-4 was installed in the overburden only to evaluate water quality within this perched zone.

4.2 WELL BORINGS

The borings for the monitoring wells were installed utilizing a truck-mounted, Mobil B-80 air-rotary drill rig. During the drilling, a JMS geologist maintained the soil boring logs and supervised the overall drilling program. Split-spoon soil samples were collected during the advancement of each well boring. All samples collected were logged and screened in the field utilizing an Hnu photoionization organic vapor detector. The drilling equipment was steam cleaned between borings to prevent cross-contamination as per NJDEP guidelines. The depths of the 8-inch diameter boreholes for wells MW-1 through MW-4 were approximately 21, 22.5, 21 and 8 feet, respectively. Boring logs and well construction diagrams are included as Appendix D.

4.3 MONITORING WELL CONSTRUCTION

Monitoring wells MW-1 through MW-4 were constructed of 4-inch OD, Schedule 40 PVC well screen (#20 slot size), and flush-joint threaded casing. All PVC sections were coupled with threaded, flush joints and PVC well caps were placed at the base of the screens. Except for MW-2 and MW-4, all wells on-site were completed with a stick-up steel protective casing. MW-2 and MW-4 were completed as flush-mount installation. Construction details and as-built certifications for each well are included in Appendices D and F, respectively.

The specific well construction details were field determined based on the depth to groundwater. MW-1 through MW-3 were cased off to the depth of the meadowmat and screened within the true groundwater. MW-4 was installed and screened within the fill material above the meadowmat. In each well, the well screen was extended at least 2 feet above the first saturated soil encountered. Once the screen and casing were set in the borehole, a Morie #2 sand filter pack was introduced in the annular space to approximately 1-foot above the top of the screen. A bentonite pellet seal was placed on top of the filter pack. The remainder of the annular space was tremie-grouted with cement/bentonite grout slurry. A steel protective casing or manhole with a locking cap was cemented at the surface to induce runoff away from the well, and to prevent unauthorized entry into the well.

4.4 WELL DEVELOPMENT/SURVEY

Upon completion of the well construction, each well was developed to remove residual sediments. The wells were pumped utilizing the Mobile B-80, truck-mounted pumping unit. Each well was pumped continuously for 1-hour or until clear of all fines.

An elevation/location survey was completed by John Cilo Associates of Somerville, NJ and Chester Dilorenzo of JMS. The top of the protective steel manhole or casing and inner PVC casing (capoff), as well as the adjacent ground surface, were surveyed to the nearest one-hundredth of a foot with reference to NJGSC datum. The horizontal location of each well was measured with reference to latitude and longitude. Copies of the monitoring well location certification, Form B, are provided in Appendix F.

4.5 GROUNDWATER SAMPLING

Groundwater sampling was conducted on-site on August 1, 1991, approximately 2-weeks after the installation and development of the wells. The laboratory analytical results for the groundwater samples collected are discussed in Section 4.5.1.

Prior to collecting groundwater samples, the depth to the static water was determined in each well. Water level measurements were obtained using an electric water level indicator. Prior to well sampling, a minimum of three (3) well volumes of water were removed from each well with a stainless steel submersible pump fitted with a new length of inert tubing. No sheen or floating product was observed in any of the wells. A copy of JMS standard groundwater sampling procedures is provided as Appendix B.

Following purging, the wells were allowed to recover with fresh formation water to near static level before sampling. The well purging equipment was decontaminated between wells in order to minimize potential cross-contamination.

4.5.1 Groundwater Sampling Results

The groundwater samples collected from each well were analyzed for PHC, VO+15, BN+15 and pH. Except for MW-2, no PHC contamination was identified in any of the wells on-site at, or above, the laboratory detection limit. Trace levels of BN compounds were detected only in MW-2 and MW-3. Volatile organic compounds were detected in MW-1 through MW-4 at concentrations of 10.3, 75.8, .031 and .082 ppm, respectively. The pH measurement in the wells ranged from 6.3 to 6.75 ppm. A summary of the analytical results is provided in Table 2; detailed results are included in Appendix A.

4.6 PRELIMINARY AQUIFER TESTING PROGRAM

4.6.1 Slug Tests Results

JMS conducted slug tests for the monitoring wells on-site on August 27 through 28, 1991. The tests were conducted in order to assess aquifer conditions. Prior to slug injection, groundwater level measurements were collected from all wells. Pressure transducers were utilized to monitor water level fluctuations in each well. Each transducer was connected to Telog data recorders that were pre-programmed to record every 10-second interval.

Slug test could not be conducted on MW-2 and MW-4 due to their location and/or construction. Both wells are flush-mounted installations. MW-4 is shallow with a total depth of 8 feet, and receives surficial recharge. MW-2 is located in the driveway area that is subject to periodic flooding. These factors were responsible for the elevated groundwater level condition in each of these wells, thereby making it impossible to complete an accurate slug test.

The results obtained for the MW-1 and MW-3 slug tests indicate that the wells installed in the native soils exhibit characteristics typically encountered within confined aquifers. The native soils which consist primarily of fine to medium sand and silty, clayey sand exhibit a characteristically low permeability. The calculated average hydraulic gradient is .0018 ft/ft and the linear velocity for groundwater is estimated at 0.0043 ft/day or 1.58 ft/year. The slug injection/extraction calculation data and

values for hydraulic conductivity (k), transmissivity (t) and the co-efficient of storage (s) for each well are presented in Appendix G. As discussed in the following section, JMS conducted an analysis of tidal influence, which confirmed that tidal changes have no significant impact on the actual groundwater flow gradient beneath the site.

4.6.2 Groundwater Flow Analysis

JMS conducted a tidal influence study at the facility during the period of August 20 through 26, 1991. The study was conducted in order to determine the impact (if any) of tidal influences on the local groundwater elevation. Pressure transducers were installed in all wells on-site and were used to monitor the groundwater fluctuations in the wells. Each transducer was connected to a Telog data recorder that was pre-programmed to record every 1-minute interval.

The data obtained indicates that the site is subject to tidal influences and periodic flooding, especially after heavy rainfall. A plot of the groundwater level changes over the monitoring period is provided in Figure F. The determined average maximum variational changes in water elevation in MW-1 and MW-3 during this monitoring period are 0.21 feet and 0.25 feet, respectively. MW-3 is the closer well to the shoreline. A summary data of the tidal data for each well is provided in Tables 3A through 3D, respectively. As previously noted, the data obtained for MW-2 and MW-4 are somewhat erratic and poorly defined. This was the result of the heavy rainfall and subsequent surface flooding which occurred following a period of heavy thunderstorms which occurred on August 21-22, 1991.

Groundwater elevation data was obtained from each well on August 1st, and August 20th, 1991, respectively. These data were used to plot a potentiometric map for each day. The groundwater level data obtained from well MW-4 was not incorporated in the data plot since this well is screened only in the perched water zone above the meadowmat. The two (2) potentiometric maps generated are provided as Figures 5 and 6.

Groundwater flow direction across the site is affected by tidal variations. Therefore, a continuous water level recording program was conducted to determine the net flow direction in the area. The data obtained was used in calculating the net hydraulic gradient and groundwater net flow distance or velocity within the confined aquifer during each tidal cycle.

The mean groundwater elevation in MW-1 and MW-3 was determined by averaging the groundwater elevation in each well throughout the daily tidal cycle. The average (mean) changes in groundwater elevation in MW-1 and MW-3 were 0.15 and 0.16 feet, respectively. The time fractions for tidal-induced fluctuations to occur at the site are 12.34 hours for the positive subcycle, and 12.12 hours for the negative subcycle. The calculated average net hydraulic gradients associated with the tidal effects in the area, using Serfes' formula (Serfes, 1989), are 0.00126 ft² and 0.00129 ft², respectively.

Serfes' formula was also used in estimating the net component of flow associated with the tidal effects in the site area. that this formula ignores the effect of porosity on groundwater The estimated tidal induced groundwater flow distance in this area of the site during the positive subcycle is approximately 0.000471 feet, and the conceptual flow is to the west. During the negative subcycle tidal induced groundwater flow is toward the east (approximately .000464 feet). Subtracting one from the other yields a net tidal induced mathematical flow estimate of 0.000007 feet in the direction of MW-3 per tidal Essentially, this confirms that there is no net tidal Due to the extremely low mean hydraulic gradient in this confined aquifer, no reversal in groundwater occurs. Only a negligible change in groundwater flow velocity, due to tidal influences, may exist. The raw data and pertinent calculations are provided in Appendix H. Therefore, the minuscule net tidal effect can be neglected in estimated actual groundwater flow at the site.

5.0 QUALITY ASSURANCE/QUALITY CONTROL

During implementation of the sampling and analytical program, the Quality Assurance/Quality Control (QA/QC) procedures recommended by NJDEP for similar investigations were strictly followed. The detailed sampling procedures and field equipment decontamination procedures are outlined in the following subsections.

5.1 SOIL AND GROUNDWATER SAMPLING PROCEDURES

A stainless steel hand auger was utilized in collecting the soil samples. Water samples were collected with a stainless steel hand bailer. During soil sample collection, a JMS geologist maintained logs of all subsurface materials encountered and was also responsible for sample collection.

Between sample collections, all sampling equipment was thoroughly decontaminated to minimize potential cross-contamination. The detailed sampling and decontamination procedures are included in Appendix B.

5.2 LABORATORY ANALYSES

All soil and water samples collected were analyzed either by Envirotech Research of Edison, NJ or Accutest Laboratories of Dayton, NJ. Both are NJDEP-certified laboratories capable of conducting the required analysis. The soil samples collected were analyzed for PHC, VO+ and BN+15. Groundwater samples were analyzed for VO+15, PHC, BN+ and pH.

The organic analysis was conducted using GC/MS methodologies for the most recent version of Methods 624, and 625 (49 FR, No. 209, October 24, 1984, as revised in 50 FR, No. 32, January 4, 1985) and "Test Methods for Evaluating Solid Waste", USEPA SW 846, 2nd edition, July 1982, with the current revisions. The petroleum hydrocarbons analysis was conducted by Infrared Spectrophotometry (EPA Method 418.1). The priority pollutant metal analyses were conducted using EPA Methods provided in "Methods for Chemical Analysis of Water and Wastewater" (EPA 600/4-79-0200).

In addition, the standard QA/QC samples (such as lab blank, duplicate/spike samples) were analyzed by the laboratories during the soil analysis. A copy of each certified laboratory quality assurance manual has previously been submitted to NJDEP.

6.0 CONCLUSIONS

JMS conducted a soil and groundwater investigation in the area of Building #19 at the Arsynco - Carlstadt Plant. The soil delineation boring/sampling program was conducted in order to determine the horizontal and vertical extent of contamination within the fill overburden. Also, it was to be used in locating "hotspots" or possible source(s) of contamination (if any). The objective of the groundwater investigation was to evaluate the impact of the site operations on groundwater quality, and determine groundwater flow direction.

6.1 SOILS RESULTS

The results of the soil sampling activity confirm the presence of contamination within the fill material. Volatile organic contamination was identified in several borings. The principal contaminants detected consisted of xylene, ethylbenzene and toluene. Of these, xylene constitutes approximately 80% of the total VOC concentration identified in the soils. The highest concentration of VOCs were detected within the immediate vicinity of Building #19 (between Building 19 and the Tank Farm) and within the drum storage area.

There does not appear to be any significant horizontal or vertical migration of contamination (specifically xylene) within the fill material or into the underlying native soil beneath the meadowmat. No xylene was detected in MW-3 which is located downgradient from MW-2. Only a trace level of xylene (.008 ppm) was detected in MW-4. None of the previously listed chlorinated solvents were detected in MW-3 or MW-4.

Conceptual soil remediation could be accomplished using either in-situ methods, on-site treatment or off-site disposal. The volume and nature of the soils involved, as well as the nature of the surrounding area precludes soil removal for on-site treatment or disposal.

In-situ methods of soil treatment include bioremediation, soil venting, and various soil washing alternatives. Soil washing methods are generally not as practical due to the large volume of liquid waste which is generated. Therefore, our initial evaluation of remedial alternatives will concentrate on bioremediation techniques and soil venting methods. The following provides a brief summary of the advantages/disadvantages of these methods.

Bioremediation

Bioremediation utilizes hybrid bacteria to destroy contaminants within the soil. Using a site-specific mix of bacteria types and nutrients, this method can be used effectively to destroy a broad range of organic contaminants. The viability of this method depends on the effectiveness of the installed nutrient distribution system. The nutrient distribution system consists of a combination of injection well points, trenches, or spray irrigation techniques. The objective is to maintain a uniform nutrient level throughout the affected soil zone. Utilization of this technique requires completion of a laboratory treatability study, followed by a permitted pilot scale study at the site.

<u>Vapor Extraction</u>

Vapor extraction techniques have proven to be very effective in remediating volatile organic contamination in soils. The method utilizes a series of vacuum wells and trenches to withdraw saturated air within the void spaces in soils. As the saturated air is withdrawn and replaced by fresh air contaminants desorb off soil particles and the process is repeated. The exhaust air is directed through a permitted treatment system in accordance with a valid air pollution discharge permit. This approach would require that the facility either modify their existing air permit, or obtain a new permit for this approach. Preliminary site investigations would be required to determine the effective radius of induced air flow within the native soils.

On site soil remediation alternatives utilize the same basic treatment methods. However, treatment is conducted within a confined area which affords better nutrient or air flow control. However, since the soil must be excavated and placed within the treatment unit, permitting requirements are far more complex. Therefore, due to current regulatory constraints, on-site treatment methods are not practical.

6.2 GROUNDWATER RESULTS

The sample analysis results indicated minor, to slightly elevated, VOC contamination except in the case of MW-2. MW-2 exhibited the most significant concentrations of VOC and PHC contamination. Total VO and PHC concentrations were 75.8 and 1.4 ppm, respectively. This well also contains several chlorinated solvents such as 1,1-dichloroethane, 1,1-dichloroethene, trans 1,2-dichloroethene, 1,1,1-trichloroethane and vinyl chloride. None of these listed compounds were identified in any of the soil samples. Further, these compounds are reportedly not utilized in the site operation. Therefore, a possible off-site source is suspected.

The boring logs for wells MW-1 through MW-3 clearly show the presence of a continuous layer of meadowmat and dense clay unit beneath the fill material. However, this layer was probably penetrated during construction of the main plant foundation in the area of well MW-2. The fill material is not homogeneous and consists of a variety of soil types. The clay layer has apparently isolated the true groundwater from serious contamination, except in the case of MW-2. This is illustrated by the normal pH range of 6.3 to 6.4 measured in the well water as compared to the 10 to 12 pH range previously obtained in the swale. The results obtained from the aquifer testing activity indicate that groundwater movement beneath the site is extremely slow.

The source of the contamination identified in well MW-2 has not been determined. The nature of the contaminants identified suggest a possible off-site source. As indicated in Appendix A, there are several industrial sources upgradient of the site. Most of the facilities are either currently under investigation or have completed investigations in the past. A thorough review of the information available with the State files regarding these adjacent sites must be conducted.

The groundwater flow analysis results confirmed that groundwater moves very slowly beneath the site. The results obtained for well MW-3 confirm that the contamination detected in well MW-2 does not extend to the Arsynco site boundary. Therefore, there is no immediate concern regarding offsite migration. However, further investigation to identify the source and remedial measures could be appropriate.

6.3 FURTHER INVESTIGATIONS

Following receipt of the Department's comments regarding the results of this investigation, the Phase II Arsynco investigation will commence. The objective of the Phase II program is two-fold. First, JMS proposes additional investigations to identify the source of the groundwater contamination identified in well MW-2. Second, initial treatability studies will be conducted on soils in the Building #19 area to determine an acceptable remediation approach for this area.

JMS will evaluate the data available within State files regarding the principal industrial sites located upgradient of the Arsynco site. Specifically, our review will center on the types of chemicals used on the site, a groundwater sampling results, and groundwater flow data. Based on the results of this data review, we will propose the location(s) for one or two additional site wells. The well locations and our rationale for placement will be discussed with the Department prior to well installation.

JMS proposes to proceed with preliminary investigations to determine the feasibility of utilizing either bioremediation or vapor extraction methods to remediate the Building #19 area. The bioremediation program will consist of completing laboratory scale treatability tests on several fill soil samples. The laboratory results will confirm the effectiveness of treatment and provide some information regarding the anticipated duration of the site remediation program. In addition, JMS will conduct additional hydraulic testing to determine if a practical means of nutrient dispersal can be designed for the site.

A series of air-flow induction tests will be conducted on wells MW-1, 3 and 4. The objective will be to define the radius of induced air flow within the fill soils. Additional vapor extraction test points may also be required to complete our assessment of this method. The objective of this testing is to provide sufficient information to design a collection system capable of remediating the area. In addition to the collection system testing, JMS will conduct laboratory scale vapor extraction tests to determine if vapor extraction is an effective remediation technique for the contamination present in these fill soils. In addition, the laboratory results would provide an indication of the duration of the program required to effectively remediate the Building #19 area.

The results of these investigations will be summarized in a complete Phase II report for evaluation by the Department. The Phase II investigation will provide sufficient information to select a remedial method for the Building #19 area, identify the source of the groundwater contamination present, and allow the facility to proceed with obtaining necessary permits, etc., to implement the soil remediation plan. The Phase II investigation will commence following receipt of comments or recommendations by the Department.

Table 1

Arsynco, Inc. - Carlstadt, NJ

Delineation Boring Sample Result Summary

Sample No.	ARSD-1	ARSD-38	ARSD-9B	ARSD-12	ARSD-17	ARSD-19	ARSD-21B	ARSD-25
Date Collected	6/21/91	6/21/91	6/24/91	6/24/91	6/24/91	6/24/91	6/24/91	6/24/91
Depth Range (Feet)	1.0-1.5	2.0-2.5	2.25-2.75	1.5-2.0	1.5-2,0	1.5-2.0	2.5-3.0	1.5-2.0
VOLATILE ORGANICS (ppb)					<u> </u>			
BENZENE	NA	ND.	ND	ND	35000	110	25000	ND
CHLOROFORM	ŅA	ND	ND .	ND	ND	22	ND	ND
ETHYLBENZENE	NA	ND	ND	ND	89000	190	44000	ND
METHYLENE CHLORIDE	NA	ND	ND	ND	1900 B	22 JB	390	JB. ND
TOLUENE	NA -	6.0	14	90	5400	4100	17000	ND
TRICHLOROFLUOROMETHANE	NA	ND	ND	ND	ND	220	ND	5 J
m-XYLENE	NA	10	ND	ND	290000	770	240000	ND
P,O-XYLENE	NA	7.2	10	310	130000	720	90000	ND
TOTAL VOLATILES	NA	23.2	24	400	551300	6154	416390	5
ORWARD LIBRARY SEARCH			•	•				
IDENTIFIED PEAKS	NA	81 (1) ND	5514 (5)	39430 (12)	8790 (6) 51540	(14) ND
UNKNOWN PEAKS	NA	8 (1) ND	120 (1)	1500 (1)	19 (1	500	(1) ND
BASE NEUTRALS (ppb)		••••••				u.o. o.o;o o o:2:4 + 4:4	a e:e:e e a:= = =	<u># # # # # # # # </u>
PRIORITY SEARCH								
BIS(2-ETHYLHEXYL)PHTHALATE	ŇA	NA	NA	· NA	2900	NA.	NA.	NA
DI-N-BUTYL PHTHALATE	NA.	NA	:NA	NA	440 J	NA	NA	NA
DI-N-OCTYL PHTHALATE	NA	NA	NA	NA	ND:	NA	NA	NA
NAPHTHALENE	NA	NA	NA	NA	4400	NA	NA	NA
PHENANTHRENE	NA	NA	NA	NA	ND	NA	NA	NA
TOTAL PRIORITY BNs	NA	NA	NA	NA NA	7740	NA	NA	NA
ORWARD LIBRARY SEARCH	ŇA	NA	NA	NA		NA NA	NA.	NA
IDENTIFIED PEAKS UNKNOWN PEAKS					932000 (15) ND	,		
ETROLEUM HYDROCARBONS (ppm)	47	780	38	170	480		780	48

NOTES: ND - not detected above method detection level

NA - not analyzed

ppm - parts per million

ppb - parts per billion

B - found in lab blank

J - below detection limit

Table 1 cont.

Arsynco Inc. - Carlstadt, NJ

Delineation Boring Sample Result Summary

Sample No.	ARSD-33	ARSD-36	ARSD-41B	ARSD-42	ARSD-44B	ARSD-47	ARSD-53	ARSD-55	ARSD-58
Date Collected	6/25/91	6/25/91	6/25/91	6/25/91	6/25/91	6/25/91	6/26/91	6/26/91	6/26/91
Depth Range (Feet)	1.0-1.5	.75-1.25	2.5-3.0	1.5-2.0	2.75-3.25	1.5-2.0	1.0-1.5	.75-1.25	.75-1.25
VOLATILE ORGANICS (ppb)									
BENZENE	ND	-ND	ND	ND	NA.	NA	110000	ND	NA
CHLOROFORM	ND	ND	ND	ND	NA	NA	ND	ND	NA
ETHYLBENZENE	2000000	1500000	130000	220000	NA	NA	1300000	ND	NA
METHYLENE CHLORIDE	ND	ND	15000 B	3100	NA	'NA	37000	970 B	NA
TOLUENE	81000	2700000	ND	4300	NA.	·NA	49000	ND	NA
TRICHLOROFLUOROMETHANE	ND	ND	ND	ND	NA	NA	ND	ND	NA
m-XYLENE	5200000	5900000	410000	930000	NA	^ NA	3300000	7400	NA
P, o-XYLENE	4100000	4100000	310000	520000	NA	NA	2500000	3400	NA
TOTAL VOLATILES	11381000	14200000	865000	1677400	ŅA	NA	7296000	11770	NA
ORWARD LIBRARY SEARCH					*				
IDENTIFIED PEAKS	198000 ((5) ND	ND	ND	NA	NA .	· ND	1900 (1)	NA
UNKNOWN PEAKS	ND	ND	ND	ND	NA	NA	ND	ND	NA
BASE NEUTRALS (ppb)									
PRIORITY SEARCH									
BIS(2-ETHYLHEXYL)PHTHALATE	4300	840	NÁ	NA NA	NA	NA NA	5000	NA	NA
DI-N-BUTYL PHTHALATE	ND	ND	NA	NA	NA	NA	ND	· NA	NA:
DI-N-OCTYL PHTHALATE	ND	ND	NA	NA	NA	· NA	180 J	NA	NA
NAPHTHALENE	ND	240	J NÁ	NA	NA	·NA	ND	NA ·	ŅA
PHENANTHRENE	ND	200	J A	NA	ŅA	NA	ND	NA	NA
TOTAL PRIORITY BNs	4300	1280	NA	NA	NA	NA.	5180	NA	NA
ORWARD LIBRARY SEARCH			NA	NA	NA	'NA		NA	NA.
IDENTIFIED PEAKS	471400 ((14) 656100	· ·				285000 (14)		
UNKNOWN PEAKS	1200 (640 (1)		
ETROLEUM HYDROCARBONS (ppm)	580	1600	380	640	610	280	650	1600	100

NOTES: ND - not detected above method detection level

NA - not analyzed

ppm - parts per million

ppb - parts per billion

B - found in lab blank

J - below detection limit

Table 2
Arsynco, Inc. - Carlstadt, NJ
Groundwater Sample Results Summary

Sample No.	MW-1	MW-2	HV-3	MW-4	FB-8/1	TB-8/1
Date Sampled	8/1/91	8/1/91	8/1/91	8/1/91	8/1/91	8/1/91
VOLATILE ORGANICS (ppb)						
BENZENE	ND	ND	5.4	40	ND	ND
CHLOROBENZENE	ND	ND	13	18	ND	ND
1,1-DICHLOROETHANE	170	3000	ND	ND	ND	ND
1,1-DICHLORGETHENE	ND	230 J	ND	ND	ND	ND
TRANS-1,2-DICHLOROETHENE	8200	13000	ND	ND	ND	ND
ETHYLBENZENE	ŅD	690	2.5 J	11	ND	ND
METHYLENE CHLORIDE	ЙD	7600	ND	ND	ND	ND
TOLUENE	ND	7000	10	5 Ĵ	ND	ND
1,1,1-TRICHLOROETHANE	ND.	14000	ND	ND	ND	ND
TRICHLOROFLUOROMETHANE	ND	2000	ND	. ND	ND	· ND
VINYLE CHLORIDE	1900	25000	ND	ND	ŅD	ND
XYLENES (TOTAL)	ND	3300	ND	7.8	ND	ЙĎ
TOTAL VOLATILES (ppb)	10270	75820	30.9	81.8	ND	ND
IDENTIFIED PEAKS	ND	ND	48 (4)	162 (6)	ND	ND
UNKNOWN PEAKS	ND	ND	7' (1).	16 (1)	ŅD	ND
BASE NEUTRALS (ppb)	:					
1,4-DICHLOROBENZENE	ND	ND	1.1 J	ND	ND	, NA
1,2-DICHLOROBENZENE	ND	NĎ	8.6 J	ND	ND	NA
ISOPHORONE	ŃĎ	3 1	ND	ND	ND	NA
DIETHYLPHTHALATE	ND	26	ŅĎ	ЙD	ŃĎ	NA
TOTAL BASE NEUTRALS (ppb)	НĎ	29	9.7	ND	ND	NA
IDENTIFIED PEAKS	305 (4)	6310 (9)	1784 (7)	5195 (7)	ND	NA NA
UNKNOWN PEAKS	42 (5)	1489 (6)	144 (8)	670 (8)	ND	NA
PETROLEUM HYDROCARBONS (ppm)	ND	1.4	ND	ND	ND	ŅA
H (STANDARD UNITS)	6.7	6.3	6.4	6.75	**************************************	NA.

NOTES: ND - not detected

NA - not analyzed

J - below detection

() - # of peaks

ppm - parts per million

ppb - parts per billion

TABLE 3A

ARSYNCO INCORPORATED - CARLSTADT, NJ

TIDAL INDUCED GROUNDWATER FLUCTUATION DATA SUMMARY

MW-1

		CHANGE IN WATER	
DATE	TIME	LEVEL (feet)	TIDAL
	•	(+ up, - down)	
8/20/91	18:43:53	+0.26	
8/20/91	23:28:53	-0.15	-
8/21/91	16:58:53	-0.07	-
8/21/91	20:34:53	+0.17	+
8/22/91	17:04:53	-0.22	.
8/22/91	21:12:53	+0.16	+
8/23/91	06:33:53	-0.11	-
8/23/91	08:54:53	+0.04	+
8/23/91	16:14:53	-0.13	-
8/23/91	21:12:53	+0.16	+
8/24/91	06:53:53	-0.12	, ·
8/24/91	09:00:53	+0.06	+
8/24/91	15:41:53	-0.09	-
8/24/91	22:31:53	+0.24	+
8/25/91	08:27:53	-0.18	- `.
8/25/91	10:25:53	+0.09	+
8/25/91	17:38:53	-0.14	-
8/25/91	23:09:53	+0.26	+
8/26/91	08:51:53	-0.20	-

^{+ =} HIGHEST LEVEL IN FEET

^{- =} LOWEST LEVEL IN FEET

TABLE 3B

ARSYNCO INCORPORATED - CARLSTADT, NJ

TIDAL INDUCED GROUNDWATER FLUCTUATION DATA SUMMARY

MW-2

DATE	TIME	CHANGE IN WATER LEVEL (feet) (+ up, - down)	TIDAL		
8/21/91	20:43:48	+0.23	+		
8/22/91	05:45:48	-0.17			
8/22/91	06:37:48	+0.18	1		
8/22/91	06:53:48	-0.18	Thunderstorm (?)		
8/22/91	11:39:48	+0.98	+ tidal		
8/22/91	13:07:48	-2.98	(anomalous		
8/22/91	14:28:48	+7.79	undefined)		
8/23/91	00:54:48	-8.93			
8/23/91	01:35:48	+0.69	Ī		
8/23/91	02:31:48	-1.07			
8/23/91	11:31:48	+3.58	+		
8/23/91	15:43:48	-1.82	-		
8/23/91	17:55:49	+0.65	+		
8/24/91	00:20:49	-1.81	?		
8/24/91	05:21:49	+3.21	?		
8/24/91	17:28:49	-0.85	-		
8/25/91	14:29:48	+0.82	?		
8/25/91	15:20:49	-2.31	?		
8/25/91	16:22:49	+2.52	?		
8/26/91	01:31:49	-3.02	?		
8/26/91	10:56:49	+3.66	?		

^{+ =} HIGHEST LEVEL IN FEET

^{- =} LOWEST LEVEL IN FEET

TABLE 3C

ARSYNCO INCORPORATED - CARLSTADT, NJ

TIDAL INDUCED GROUNDWATER FLUCTUATION DATA SUMMARY

MW-3

D3.000	MT14T	CHANGE IN WATER	mrn. v
DATE	TIME	LEVEL (feet)	TIDAL
		(+ up, - down)	
8/20/91	19:05:32	+0.28	
8/21/91	05:42:32	-0.15	-
8/21/91	09:28:32	+0.07	~ +
8/21/91	15:11:32	-0.11	-
8/21/91	20:14:32	+0.20	+
8/22/91	16:47:32	-0.29	· -
8/22/91	20:52:32	+0.20	+
8/23/91	06:38:32	-0.15	-
8/23/91	09:23:32	+0.05	+
8/23/91	10:52:32	-0.06	?
8/23/91	11:38:32	+0.05	+
8/23/91	17:46:32	-0.12	-
8/23/91	21:53:32	+0.21	. +
8/24/91	06:53:53	-0.18	.
8/24/91	09:00:53	+0.12	+
8/24/91	09:51:32	-0.09	-
8/24/91	16:38:32	+0.28	+
8/25/91	22:43:32	-0.22	- .
8/25/91	10:33:32	+0.15	+
8/25/91	17:36:32	-0.17	-
8/25/91	23:14:32	+0.32	+
8/26/91	08:42:32	- 0.26	_

^{+ =} HIGHEST LEVEL IN FEET

^{- =} LOWEST LEVEL IN FEET

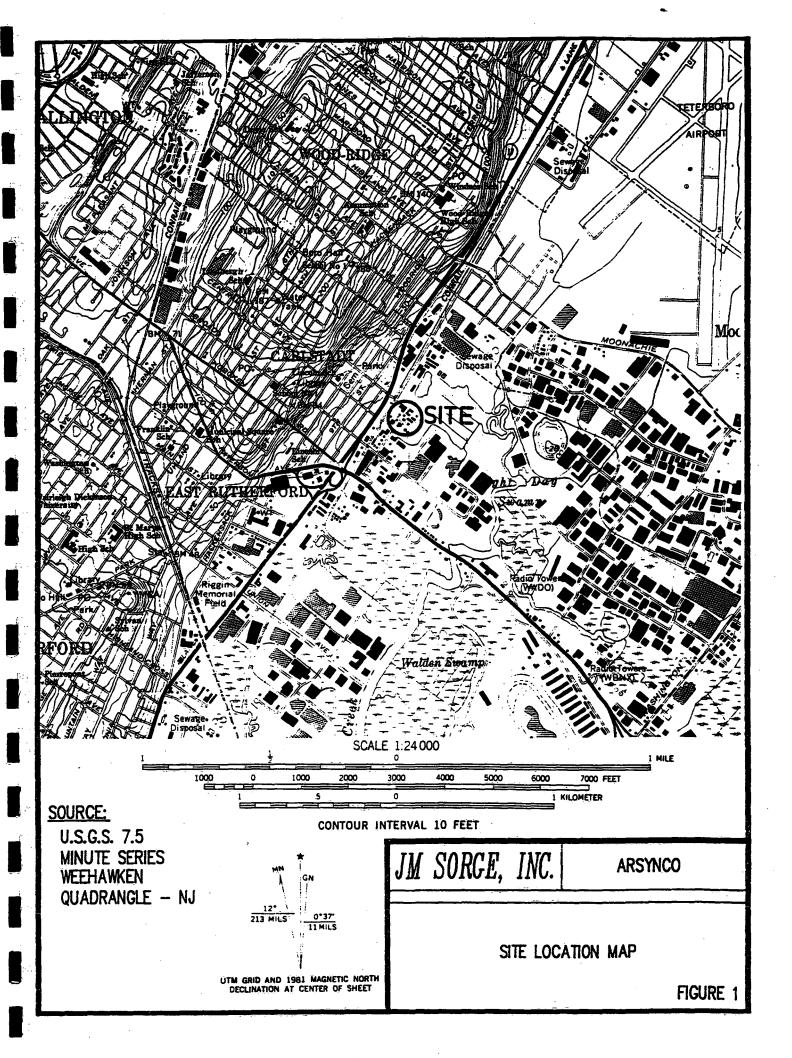
TABLE 3D

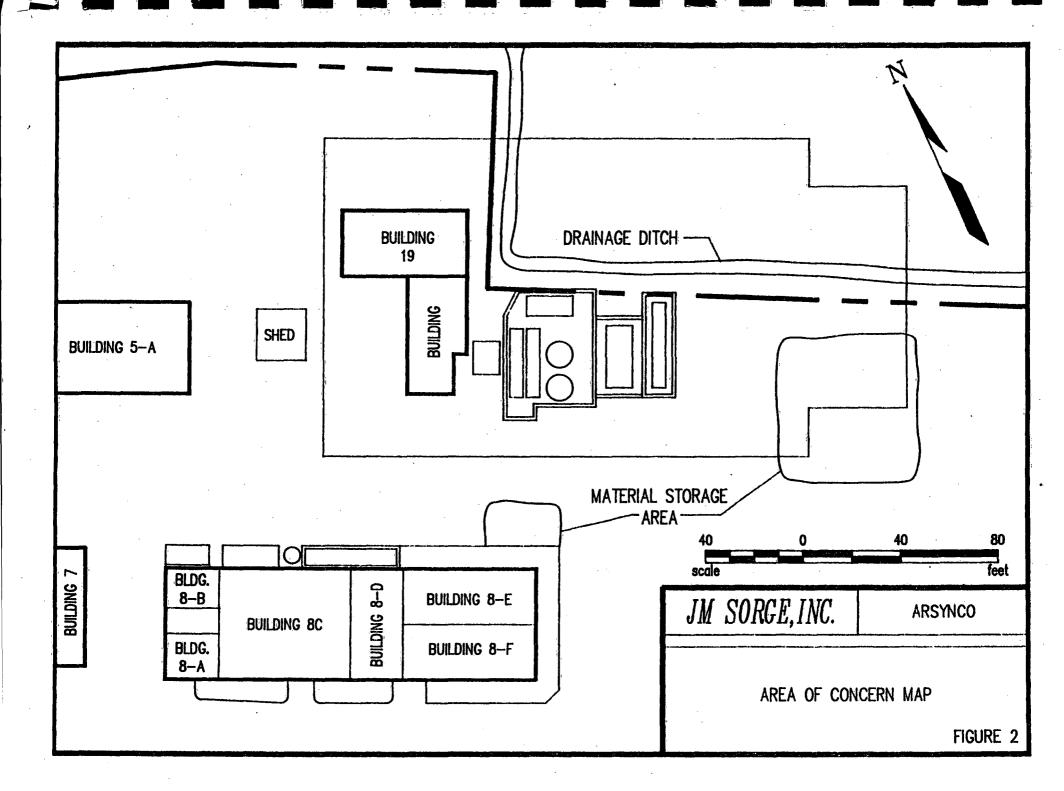
ARSYNCO INCORPORATED - CARLSTADT, NJ
TIDAL INDUCED GROUNDWATER FLUCTUATION DATA SUMMARY
MW-4

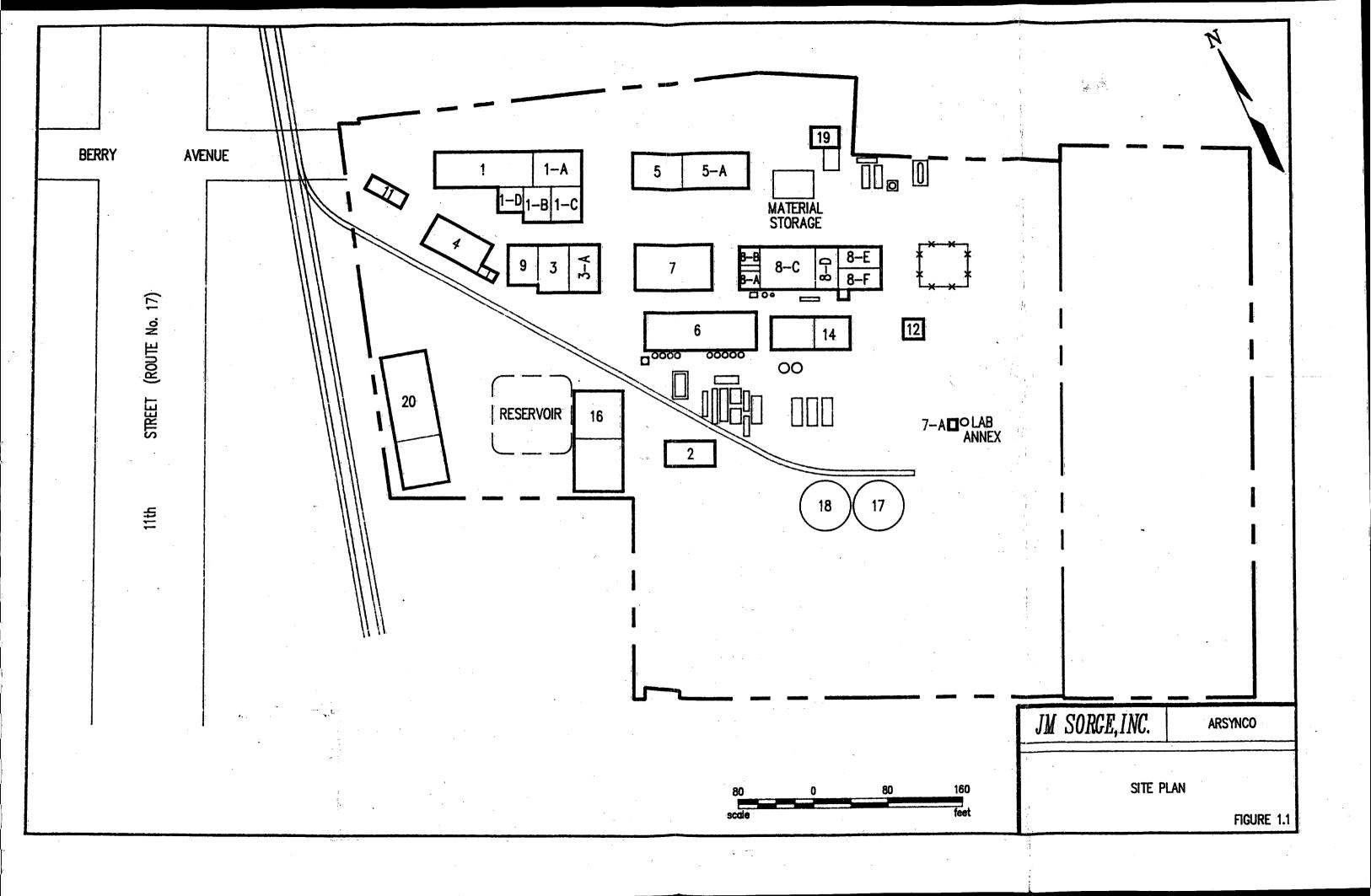
•		CHANGE IN WATER	
DATE	TIME	LEVEL (feet)	TIDAL
		(+ up, - down)	
8/21/91	05:38:23		
8/21/91	17:26:23	-0.11	
8/21/91	23:18:23	+0.12	+
8/22/91	08:33:23	-0.15	-
8/22/91	09:57:23	+4.41	?
8/23/91	04:16:23	-3.60	?
8/23/91	11:51:23	+3.21	?
8/24/91	07:19:23	-4.29	?
8/24/91	22:05:23	+0.38	+
8/25/91	06:22:23	-0.38	-
8/25/91	15:23:23	+0.07	?
8/25/91	20:33:23	-0.05	?
8/26/91	00:17:23	+0.09	+
8/26/91	06:30:23	-0.02	· _
8/26/91	07:06:23	+0.03	÷
8/26/91	09:21:23	-0.03	-
8/26/91	09:21:23	-0.03	÷ .

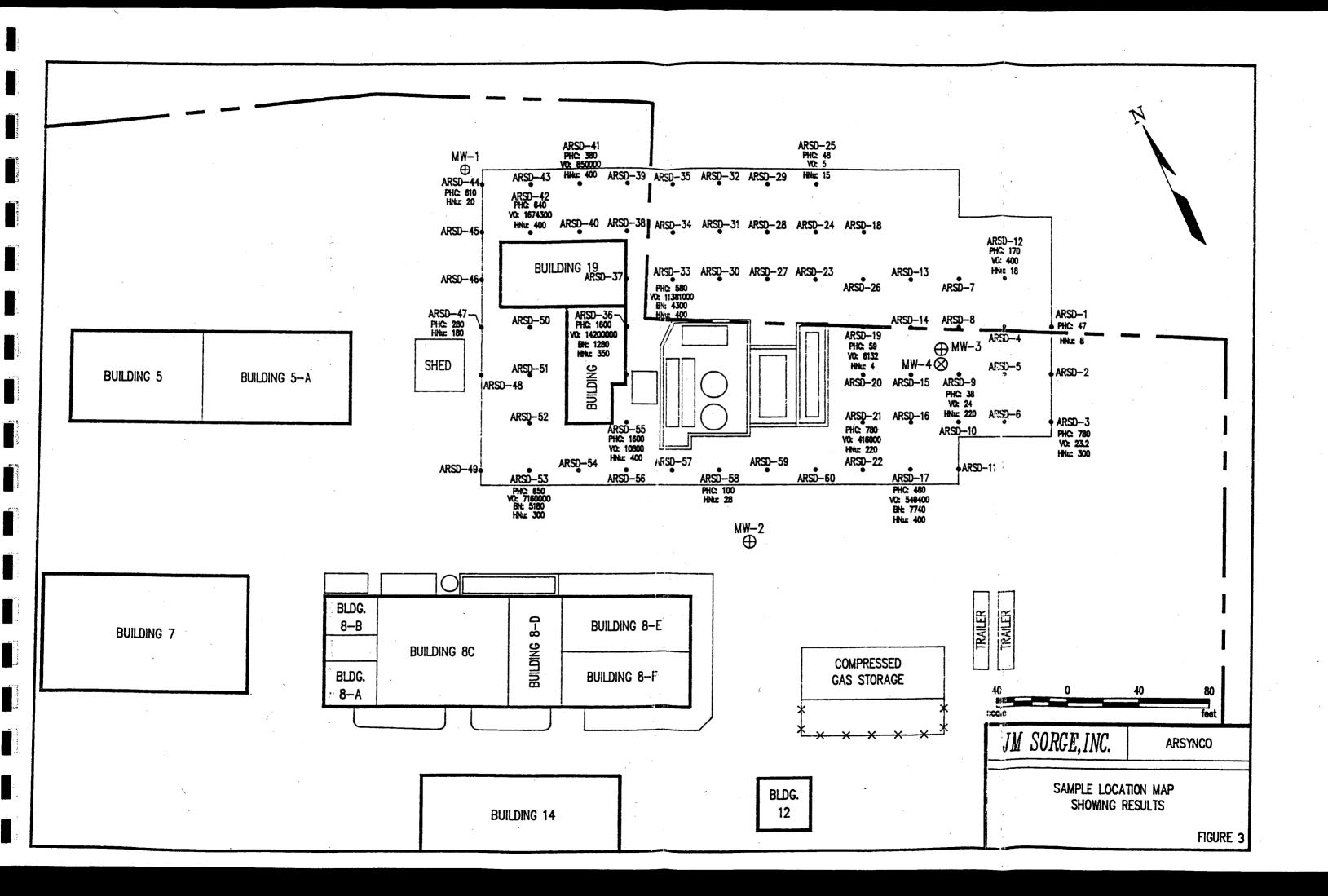
^{+ =} HIGHEST LEVEL IN FEET

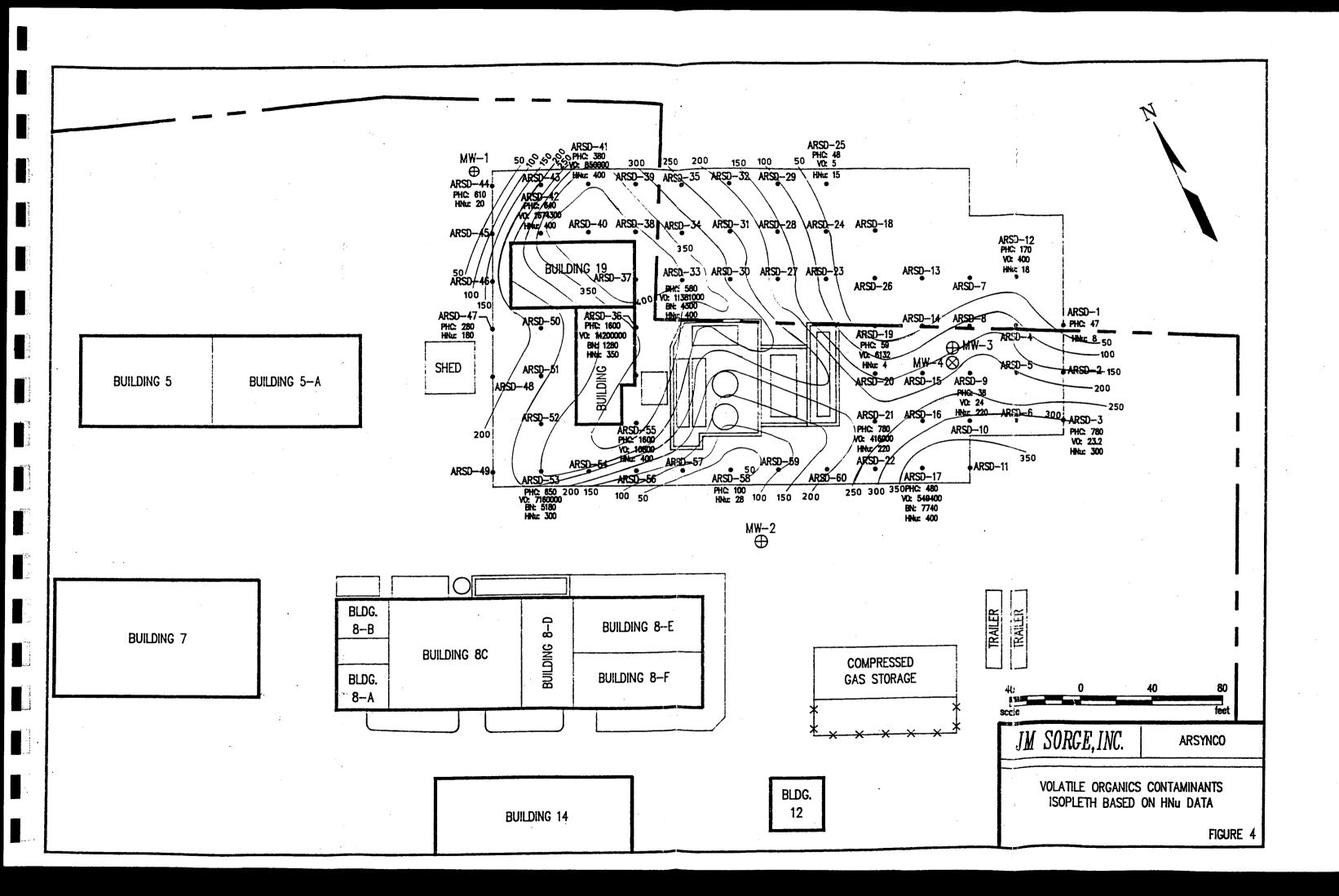
^{- =} LOWEST LEVEL IN FEET

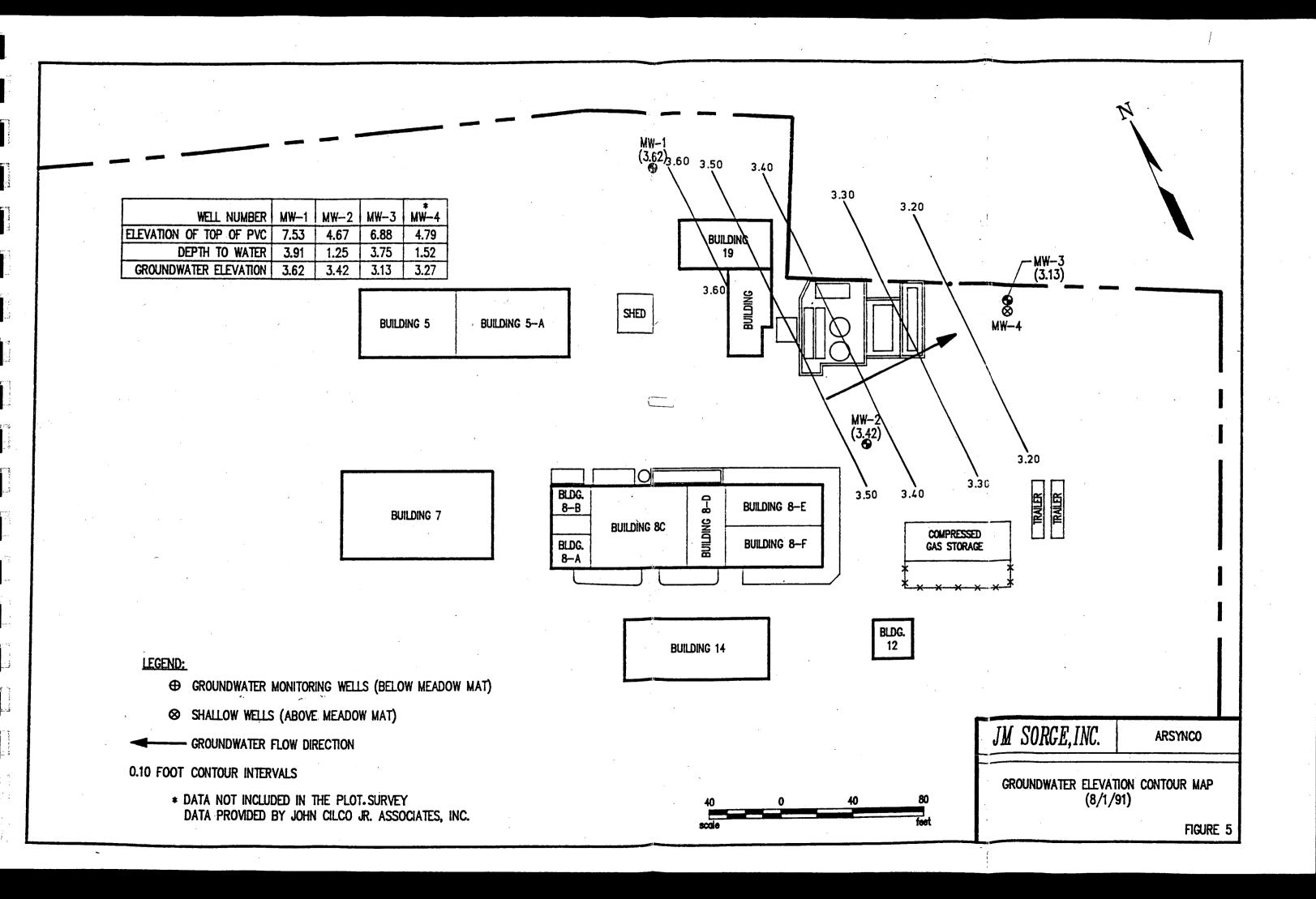


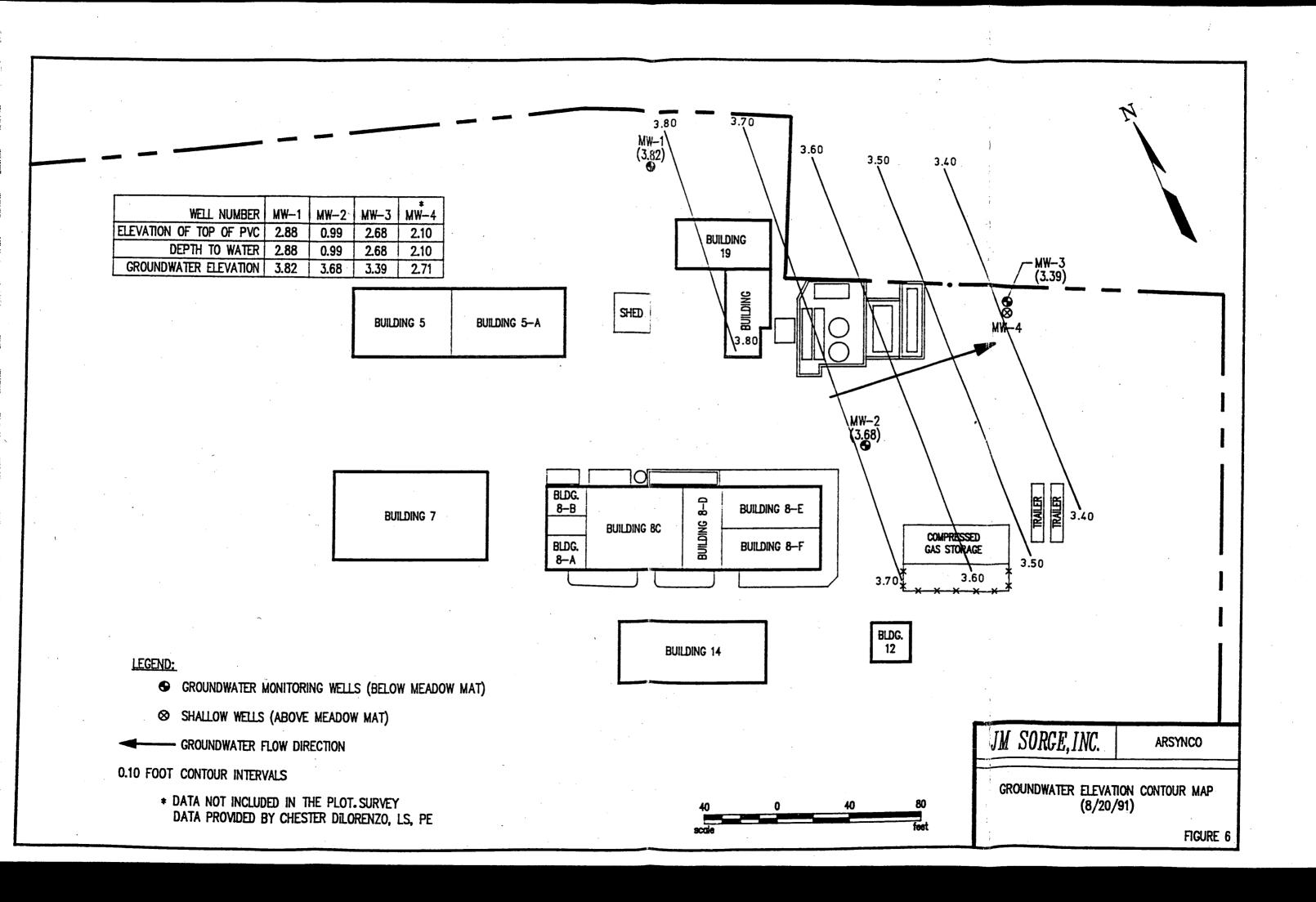


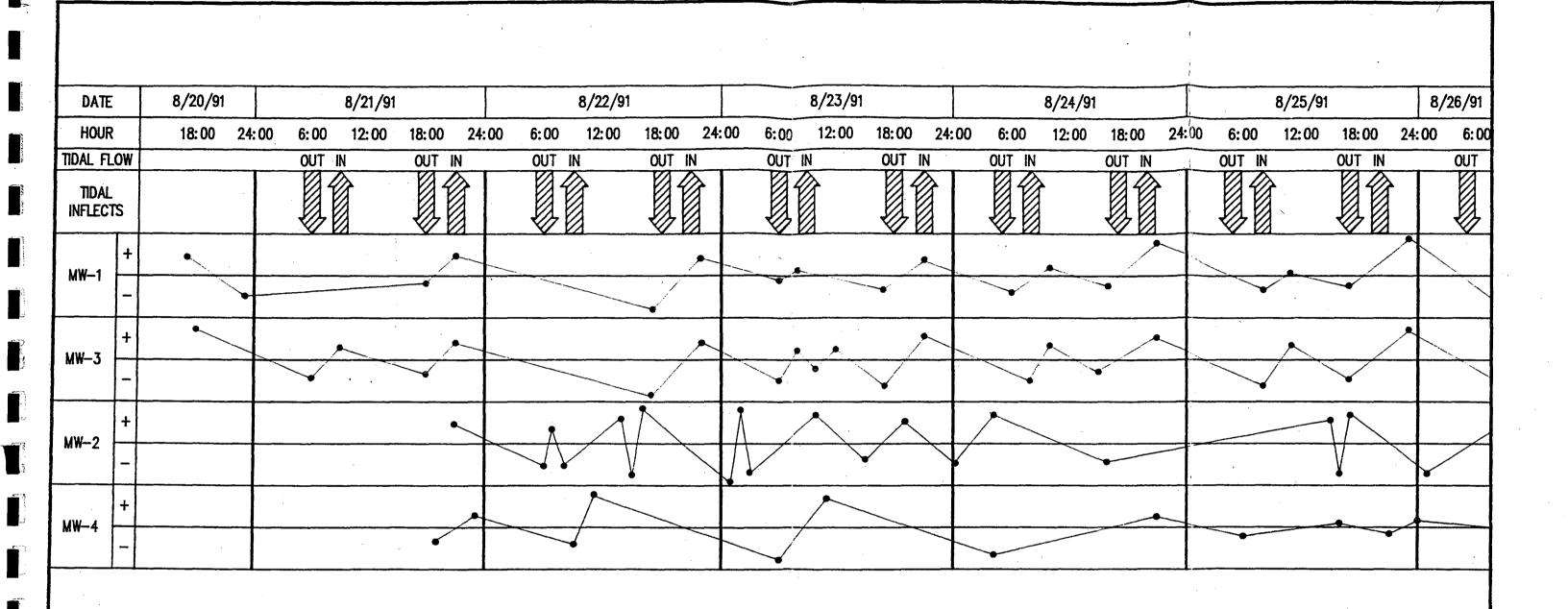












AVERAGE MAXIMUM CHANGES IN WATER LEVELS: MW-1 + 0.21 FEET - 0.20 FEET

MW-3 + 0.24 FEET

- 0.23 FEET

MEAN CHANGES IN: MW-1 ± 0.15'

 $MW-3 \pm 0.16$

JM SORGE, INC.

ARSYNCO

DIAGRAMATIC ILLUSTRATION OF TIDAL
NFLUENCES ON GROUNDWATER ELEVATIONS IN
MONITORING WELLS ON SITE

FIGURE 7